WA 6909
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4a

RCRA COMPLIANCE
REGION 10

EPA INSPECTION REPORT SUBMITTAL SLIP

I. Submitted By: J. Bollen Date: 6/22/87

✓ Narrative
✓ Checklist(s)
✓ Photos
✓ Attachment(s) Ecol. ltr & checklist
___ Comments

COMPANY NAME

RBT
Insp of 6/10/87
WAD... 6906

No CMEL Attached — submitted this date

GW=S
CP=O
FR=O
OT=X

II. Date Reviewed: 6/26/87
Reviewed By: CRice
Title: Chief RCS

✓ Accepted ___ Returned

III. Comments:

IV. Route To: ~~① Martha R – for 7C entry~~
~~② Andy B – FYI~~ (have Jack send copy to Ecology ✓)
~~③ M. Bailey~~
④ FG

Rec'd 6/22/87 WMTB

Facility: Ridgefield Brick and Tile Co.

ID no.: WAD009036906

Date of Inspection: June 10, 1987
Date of Report: June 15, 1987

Address: 3510 NW 289th St.
Ridgefield, WA 98642

Report prepared by: Jack Boller, Environmental Protection Specialist
Washington Operations Office
Olympia, Washington 98504
EPA Region 10

Inspectors: Jack Boller, EPA/WOO Jack Boller
Judy Belcher, Ecology SWRO

Purpose:

This inspection was conducted to gather information on facility compliance with applicable regulations for management of hazardous waste under the Washington State and United States hazardous waste laws.

General Facility Process Information:

Ridgefield Brick and Tile is owned and operated by Pacific Wood Treating, Inc. It is located approximately one mile northeast of Ridgefield, Washington. The location was formerly the site of a brick manufacturing facility. Pacific Wood Treating bought the site and began using the clay pit to landfill ash from the waste incinerator operating at its Wood Treating facility in Ridgefield. The site stopped receiving waste on 1/4/83. Since then, a clay cap has been placed over the landfill and a leachate collection system was installed. A tow drain feeds leachate into a collection tank. When the tank is full, the contents are shipped by a tank truck to Crosby & Overton in Kent, Washington. An underdrain collects water that flows under the site and discharges it into the ditch along the road that runs past the site.

Notification and Reports:

Notification of hazardous waste activities at the Ridgefield Brick and Tile site was filed as part of the Pacific Wood Treating notification on 8/11/80. A "part A" application was filed for the site on 5/19/83. A closure plan has been submitted and is currently undergoing EPA review.

Inspection:

On June 10, 1987, Ms. Judy Belcher of Washington Department of Ecology and I arrived at the Pacific Wood Treating (PWT) site at 9:30 AM. The weather was clear and warm. We were met by Mr. Bryant Adams of PWT and shown to a meeting room. There we were joined by Mr. Bryan Johnson and Ms. Elizabeth Thutt of Hazard Management Specialist. Mr. Adams explained that Mr. Johnson and Ms. Thutt had been contracted to file for a delisting of the waste at the Ridgefield Brick and Tile (RBT) site. We discussed briefly the delisting process. I then asked about the facility plans. Ms. Belcher had reviewed the contingency plan and training plan during her inspection of PWT. Her report is attached. Mr. Adams said that there was no waste analysis plan but manifests for the leachate were on site. After this meeting we travelled out to the RBT site.

The facility consists of a grassy field containing a square area approximately 100 X 100 ft. The area was surrounded by a barbed wire fence and covered with sheets of plastic held down by old tires scattered across it. There was a locking metal gate on the fence but there were no warning signs. I pointed this out to Mr. Adams and he said that he would correct this.

The drain system and the lysimeters were visible. The collection tank for the leachate is a square steel tank 8' X 4' and 5' high. It has a locked wooden cover on it and is checked visually on a weekly basis and more often when nearly full. The inspection was concluded at this time and we returned to the PWT site at 10:30 AM.

Conclusions:

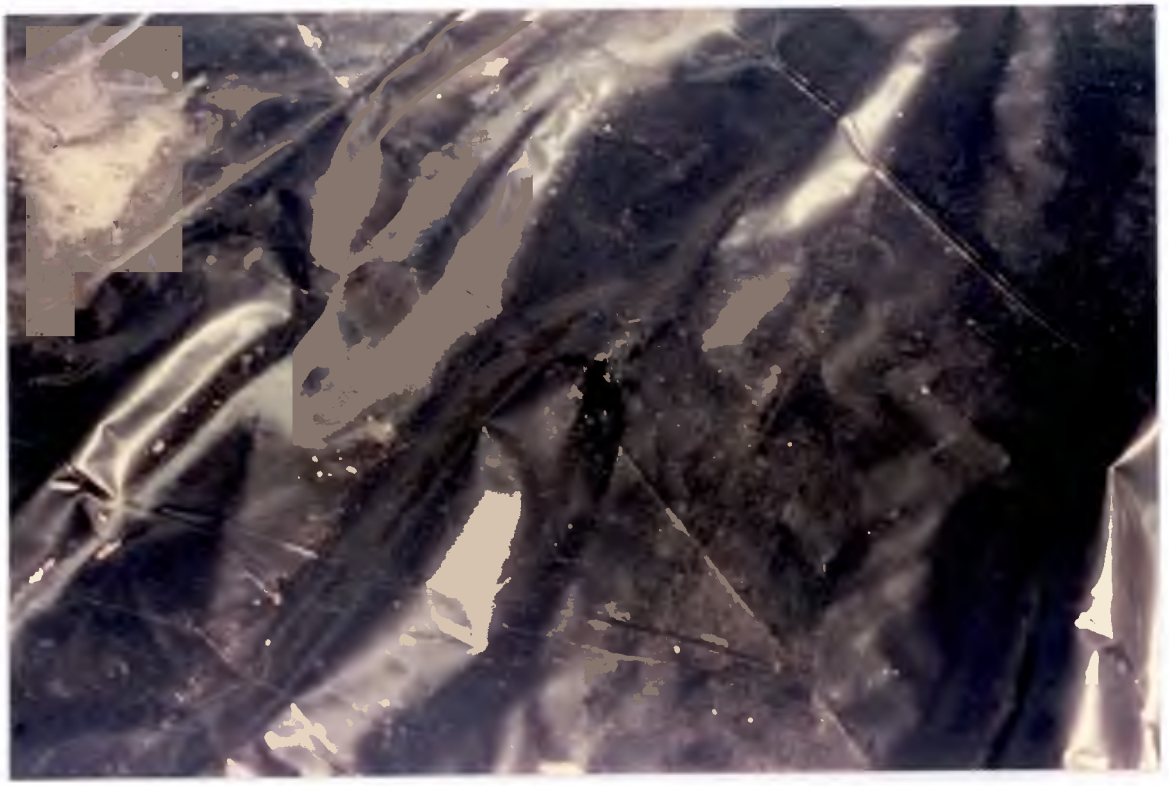
The deficiencies noted for the RBT site during the inspection were: 1) no waste analysis plan and; 2) no warning signs on the fence around the landfill. The facility receives no waste at this time and generates only leachate which is shipped to an approved TSF where it is tested so the lack of a waste analysis plan is not a serious problem. Mr. Adams was informed of the requirement for warning signs and assured me that he would correct the problem.

Cover on landfill. West end.

Cover on landfill. East end.

Cover on landfill taken inside fence.

Cover on landfill taken inside fence.



Hole in cover.

Separation of plastic cover.

Tow drain.

Building on site.

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

I. General Information
II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
III. Generator Regulations (40 CFR 262)
IV. Transporter Regulations (40 CFR 263)
V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised November 21, 1983)

A. Date/Time Inspection commenced: June 10, 1987 9:30AM

B. Facility
EPA/State ID WAD009036906
Name & Addresses Ridgefield Brick + Tile
1. Mailing: 111 W Division
2. Location: 3510 NW 289th st
Ridgefield, Wa. 98642

Contact: Bryant Adams
Telephone: (206) 887-3562

C. Compliance Summary

	IN	OUT	N/A
RCRA (Statute)	( )	(X)	( )
40 CFR 270 Permit prog.	( )	( )	(X)
40 CFR 124 Permit	( )	( )	(X)
40 CFR 261.5 Small Quantity Generator	( )	( )	(X)
40 CFR 262 Generator	( )	(X)	( )
40 CFR 263 Transporter	( )	( )	(X)
40 CFR 264 (Permit) TSD	( )	( )	(X)
40 CFR 265 Interim Status TSD	( )	X	( )

Specific Violations: Contingency Plan has minor violations identified in Ecology's inspection report of 6/8/87

D. Inspector

Name (Print) Jack Boller Title: EPS
Signature Jack Boller
Organization EPA Region 10 WD00
Phone (206) 753-9428 FTS 434-9428

E. **Inspection Participants:**

Name	Title	Phone #
Judy Belcher	Ecology	(206) 753-0147
Bryant Adams	PWT/RBT Environmental affairs	(206) 887-3562
Bryan Johnson	Hazard Management Specialists	(503) 274-2217
Elizabeth Thutt	" " "	(503) 274-2217

F. **Notification/Permit Information**

1. Started operation: as landfill Date: 12/1/78 (from part A)
2. Notification filed: (YES) NO Date: 8/11/80 (as part of Pacific Wood Treaters)
3. Part A application filed: (YES) NO Date: 5/19/83
4. Part B called/Date Due (YES) NO Date: April 1983 a request ~~was made~~ made to Pacific Wood Treating ~~for the~~ for a part B for the clay pit,
5. Part B application: YES (NO) Date: facility chose to
6. Changes in Notification or Part A: close the unit

7. Facility's classified as:

Generator	( )
Transporter	( )
Treatment facility	( )
Storage facility	( )
Disposal facility	(X)
Small quantity generator	( )
Recycler	( )
Less than 90 day storage	( )
Wastewater treatment unit exemption (WWTU)	( )
Elementary neutralization unit exemption (ENU)	( )

8. Does facility have a Part A withdrawal request in ? YES (NO)
not in file.

Status

Comments:

G. Hazardous Waste Generation (HW)and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

(1) Ignitability none generated
(2) Corrosivity
(3) Reactivity
(4) EP Toxicity

b. Listed HW?

(1) HW from non-specific sources (FXXX)

(2) HW from specific sources (KXXX)
K001 from wood treating processes

c. Discarded commercial chemical product(PXXX or UXXX)

(1) PXXX none
(2) UXXX

d. Has facility petitioned to delist waste? (YES) NO

Date: In process of filing petition Comments:

e. Does facility qualify for WWTU or ENU? YES (NO)

Comments:

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste? yes

(1) What are the wastes generated? Ash and sludge from Waste generated in wood treating.

(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)? Leachate collected from landfill

Comments: Knowledge of waste streams

(3) Are records available on the determination(s)? (YES) NO

N/A no waste generated

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application? YES NO

If so explain.

2. Specific information
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

a. EPA HW Code
b. HW description
c. Composition (including sampling requirements)
d. Process producing waste:
e. Rate of waste production
f. Time of storage
g. Waste handling prior to disposal
h. Waste disposal practice and manifest
i. Reporting and recordkeeping
j. Comments

H. Miscellaneous Notes:

N/A not a small quantity generator ~~the waste generator~~

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised November 21, 1983)

A. General

1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]? YES NO

a. If yes, generator must comply with the generator regulations (262) and if stored for more than 90 days the applicable TSD regulations. Refer to Generator and/or TSD inspection checklist.

B. Small Quantity Generator (SQG) Regulations

1. A SQG must determine if he generates a hazardous waste (262.11). YES NO

2. Which of the following describes the SQG's treatment and/or disposal of his HW?

a. occurs on-site YES NO

b. ensure delivery to an off-site facility, either of which is:

(1) permitted under Part 270 YES NO

(2) in interim status under Part 270 and 265 YES NO

(3) authorized to manage HW by an authorized state YES NO

(4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES NO

(5) (a) facility which

(a) beneficially uses, re-uses recycles or reclaims his HW YES NO

b. treats his waste prior to use, re-use, recycle, or reclamation YES NO

3. Does generator manifest his wastes (not required)? YES NO

III. Generator Regulations 40 CFR 262 (Date Revised November 21, 1983)

A. Is the facility or does facility claim to be a small quantity generator? YES (NO)

Comments:_____

B. Does generator transport its own waste? YES (NO)

1. If NO, what is contractor's EPA ID, name, address, and phone?

2. If YES, see Transporter Regulations (Section III).

C. Does generator use the manifest system? (YES) NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number? YES (NO)

What transporters or TSD facilities?

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

a. Manifest document number (YES) NO

b. Generator's name, mailing address, phone number, and EPA ID number (YES) NO

c. Name and ID number of each transporter (YES) NO

d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any. (YES) NO

e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203. (YES) NO

- Proper shipping name (YES) NO
- Hazard Class (YES) NO
- Identification number (YES) NO

f. Total quantity of each hazardous waste by units of weight or volume and type and number of containers placed aboard transport vehicle. (YES) NO

4. Does the manifest contain the certification attesting to proper classification, description, packaging, labeling, marking and condition in accordance with DOT and EPA regulations? (YES) NO

5. Does the manifest contain an adequate number of copies to provide one copy for:

   a. Generator's records (YES) NO

   b. Records of each transporter (YES) NO

   c. TSD facility owner or operator's records (YES) NO

   d. Signature by each transporter and return to generator (YES) NO

   e. Signature by TSD facility and return to generator (YES) NO

6. Does the generator use the manifest properly by:

   a. Signing the certification (YES) NO

   b. Obtaining signature and date of acceptance from initial transporter (YES) NO

   c. Retaining one copy of the transporter's signed manifest for 3 years or until receipt of a signed copy from disposal facility (YES) NO

   d. Giving transporter the remaining copies of the manifest (YES) NO

7. Does the generator contact the transporter and/or the designated TSD facility to determine the shipment status in the event that a signed copy from the designated facility has not been received within 35 days? (YES) NO

8. Does the generator submit an Exception Report to the U.S. EPA in the event that a signed copy of the manifest has not been received from the designated TSD facility within 45 days? (YES) NO

9. The Manifest Exception Report must include

   a. A legible copy of the manifest and

   b. A letter of explanation describing efforts and results of status investigation.

********** TSD FACILITIES SKIP TO MODULE V **********

TSD

D. Does generator operate a specific area on-site for container handling or storage? YES NO

1. Does generator comply with the requirements set forth in governing on-site waste accumulation: YES NO

   a. Labeling and marking YES NO

   b. Dating YES NO

   c. Inspections (weekly for containers) YES NO

2. Are incompatible wastes segregated? YES NO

3. What quantities of HW are stored? _____

4. What is the longest period that it has been stored? _____

5. Were there any hazardous wastes stored on site at the time of inspection? (90 day storage allowance is allowed only if waste is stored in accordance with §262.34; i.e. must be stored in containers or tanks. Thus need to make note if storing in waste pile, etc.) YES NO

   a. If yes, do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? YES NO

   b. If not properly packaged or in secure tanks, please explain. YES NO

   c. Are containers clearly marked and labeled? YES NO

   d. Do any containers appear to be leaking? YES NO

   e. If yes, approximately how many? _____

TSD

6. Generators may store hazardous waste for less than 90 days without a permit or TSD status providing certain requirements have been met. YES NO

   a. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES NO

   b. Are the containers always closed, except to add or remove waste? YES NO

   c. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES NO

   d. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO

   e. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO

   f. Is the facility aware of and complying with the following requirements for incompatible wastes:

      (1) Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO

      (2) HW must not be placed in an unwashed container that previously held an incompatible waste YES NO

      (3) Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO

      Explain?

   g. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES NO

   h. Comments:

TSD

7. a. Does the generator import or export HW? YES NO

b. If yes, has notification of this activity been submitted to the EPA Regional Administrator? YES NO

c. Is a copy of that notification available? (If yes, obtain copy). YES NO

d. If a copy is not available, or can not be obtained, determine: 1) when the notification was submitted; 2) for what waste type and; 3) for what foreign facility (name and address). YES NO

8. TANKS

Where tanks are used to store hazardous waste, the requirement of 40 CFR Part 265 Subpart J must be complied with (except 265.193), as follows:

a. Is storage in tanks conducted such that:

(1) It does not generated heat, pressure, fire, explosion or violent reaction? (If no, explain) YES NO

(2) It does not produce uncontrolled toxic mists, fumes, dusts, or gases? (If no, explain) YES NO

(3) It does not produce uncontrolled flammable fumes or gases? YES NO

(4) It does not damage the tank? YES NO

(5) It does not threaten the environment in other ways (i.e., leaks, spills)? YES NO

Comments:

b. Is 2 feet of freeboard maintained in uncovered tanks? YES NO

If no, is secondary containment used? YES NO

(Explain)

c. Is the tank(s) continuously fed? YES NO

If yes, is there a means to stop inflow? YES NO

Explain

TSD

d. Are inspections of the following conducted:

(1) Discharge control equipment? YES NO
How often?

(2) Waste feed cut-off systems? YES NO
How often?

(3) Data from tank monitoring equipment? YES NO
How often

(4) The level of waste in the tank? YES NO
How often?

(5) The structural integrity of tank? YES NO
How often?
How are inspections conducted?
What is observed (looked for)?

(6) The immediate area around the tank for signs of leaks and the integrity of secondary containment (if any)? YES NO

e. (1) Have any tanks once used for storage of hazardous waste been closed or their function changed? When?

(2) Were all hazardous wastes and/or residues removed? YES NO

(3) What was the disposition of the wastes or residues (i.e., where did it go)? YES NO

(4) When shipped?

f. Are ignitable or reactive wastes placed in tanks? YES NO

If yes, what measures are used to prevent ingnition or reaction?

g. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue? YES NO

h. (1) If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements? YES NO

(2) Are "No Smoking" signs posted? YES NO

TSD

(3) Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks? YES NO

Explain

9. Preparedness and Prevention (265 Subpart C)

a. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? YES NO

Explain:

b. Is internal emergency communication equipment or alarm systems installed? YES NO

What type?

c. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES NO

d. Are fire extinguishers or other emergency equipment immediately available on-site? YES NO

e. Is emergency communications and response equipment tested? YES NO

How often?

f. Is aisle space adequate for emergency response? YES NO

What is the aisle spacing?

g. (1) Have any arrangements been made with local emergency response organizations? YES NO

(2) Which organizations?

(3) If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? YES NO

Explain

TSD

10. Contingency Plan/Emergency Procedures

a. Has contingency plan been developed? (It may be a modified SPCC plan) YES NO

b. Have incidents occurred where the plan has been implemented? YES NO

c. Have incidents occurred where the plan should have been implemented but was not YES NO

Explain

d. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:

(1) Does the plan describe actions to be taken by personnel in response to fire, explosion, or releases to the environment? YES NO

(2) Does the plan describe arrangements made with external emergency response organizations? YES NO

(3) Does the plan list those qualified to act as emergency coordinator including their name, address, and phone? YES NO

(a) Is the list current? YES NO

(4) Is all emergency equipment available at the facility listed in the plan? YES NO

(a) Is the location and a description of the equipment included? YES NO

(b) Are capabilities described for each piece or equipment unit? YES NO

(5) Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternative routes)? YES NO

(6) Is a copy of the plan maintained at the active facility (versus main office)? YES NO

(a) Has a copy been supplied to appropriate off-site emergency response organizations? YES NO

To which?

TSD

(7) Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? YES NO

How are they available

What are the limits of this person's authority to respond to emergencies?

(8) Has an emergency occurred? YES NO

Was the plan implemented? YES NO

(Describe the incident)

11. Personnel Training

a. Has a training program been developed? YES NO

What type? (Classroom? On-the-job Training?)

b. Does the program include contingency plan and response training? YES NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including:

(1) Procedures for using and maintaining equipment? YES NO

(2) Key parameters for automatic waste feed cut-off? YES NO

(3) Communications or alarm equipment? YES NO

(4) Response to fire and explosion? YES NO

(5) Response to ground water contamination incidents? YES NO

(6) Facility shut down? YES NO

d. Are records available at the facility for the following:

(1) Job title for each position related to hazardous waste management and maintaining equipment? YES NO

(2) Written job description for each job title? YES NO

TSD

(a) Does the job description include the skill, education or qualifications required for the position? YES NO

(b) The duties assigned to that position? YES NO

(3) A written description of the type and amount of training to be given to those in each job position? YES NO

(4) A record of training completed or experience obtained for each job position by employee? YES NO

(5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? YES NO

E. Is Generator familiar with Generator Reporting Procedures?

1. Annual Reports YES NO
2. Exception Reports YES NO
3. Spills and Discharges into the Environment YES NO
4. Comments

F. Is generator aware of and complying with regulations concerning the preparation of hazardous waste for transport? YES NO

1. Packaging 40 CFR 173, 178, 179, and with requirements of STATE YES NO
2. Labeling 49 CFR 172 YES NO
3. Marking 40 CFR 172 YES NO
4. Placarding 49 CFR 172 Subpart F YES NO
5. Containers with of hazardous waste must be marked with the following or essentially equivalent, words and in information, displayed in accordance with 40 CFR 172.304.

HAZARDOUS WASTE - State and Federal Law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the U.S. Environmental Protection Agency.

Generator's Name and Address
Manifest Document No. _____

6. Comments"

TSD

G. Are any wastes generated at this facility being transported or stored prior to being recycled, reclaimed, or recovered?

YES NO

1. If yes, what are they_____

a. Sludge ( )
b. Characteristic Hw ( )
c. Listed Hw ( )
d. Comments

N/A not a transporter

IV. Transporter Regulations (40 CFR 263) (Date Revised November 21, 1983)

A. Transporter facility description.

1. Operates as a Transfer Facility — YES NO
2. Operates as a Storage Facility — YES NO
3. Operates as a Generator — YES NO
4. Imports Wastes — YES NO
5. Combines Manifested Shipments — YES NO

B. Does transporter have an EPA ID? — YES NO

C. Does the transporter comply with generator regulations under Part 262 if he imports hazardous waste or combines wastes of different DOT shipping descriptions into a single container? — YES NO

D. Does the transporter comply with storage regulations under Parts 270, 264, and 265 if he stores manifested shipments at a transfer facility for more than 10 days? — YES NO

E. Is transporter aware of and complying with manifest requirements under RCRA 263.20?

1. Before transporting HW is manifest dated and signed by generator? — YES NO
2. Does the transporter sign, date, and return a copy of the manifest to the generator before transporting waste off the generator's property? — YES NO
3. Does the transporter delivering hazardous waste to another transporter or the designated facility:

   a. Obtain a signed and dated (S/D) copy of the manifest? — YES NO

   b. Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date? — YES NO

   c. Give remaining copies of the manifest to accepting transporter or designated facility? — YES NO

N/A not a transporter

4. Does transporter deliver the entire quantity of HW accepted to:

   a. The designated facility listed on the manifest? or YES NO

   b. The alternate designated facility in the event the shipment cannot be delivered to the designated facility? or YES NO

   c. The next designated transporter? YES NO

5. If delivery is not possible, does the transporter contact the generator and revise the manifest according to instructions? YES NO

F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? YES NO

   1. Give notice to generator YES NO

   2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15?

   3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. YES NO

   4. Comments YES NO

V. TREATMENT, STORAGE and DISPOSAL (TSD) Interim Status Regulations Facilities, 40 CFR 265. (Date Revised November 21, 1983)

A. Type of Activity

1. Storage

a. Containers	( )
b. Tanks	
(1) Above ground	(X)
(2) Below ground	( )
c. Surface Impoundments	( )
d. Waste Piles	( )
e. Other	( )

2. Treatment

a. Settling	( )
b. Evaporation	( )
c. Filtration	( )
d. Energy Recovery	( )
e. Incineration	( )
f. Thermal Treatment	( )
g. Recycling/Recovery	( )
h. Chem/Phys/Biological	( )
i. Other	( )

3. Disposal

a. Landfill	(X)
b. Land Treatment	( )
c. Surface Impoundment	( )
d. Incineration	( )
e. Other	( )

4. Comments:

5. Are hazardous wastes accepted from "outside" (off-site) sources(wastes not generated on site)? YES (NO) not since 1/83

   a. If YES, has a chemical and physical analysis of a representative sample been obtained in accordance with 40 CFR 265.13? (YES) NO waste deposited prior to 1/83 was analyzed.

   b. Does the facility confirm that each hazardous waste received at the facility matches the identity of the waste on the manifest? (YES) NO

   c. How does the facility determine this? Knowledge of waste stream. Facility is owned and operated by same o/o as the generator of the waste. (PWT)

B. Subpart B - General Facility Standards (40 CFR 265.10 - 265.17)

1. Does the facility obtain a detailed analysis of his waste prior to storing, treating, or disposing of it?
YES (NO)

Describe: Used knowledge of waste stream and some analysis.

2. Does the facility follow a Written Waste Analysis Plan
Does the Plan include? NO

a. Parameters to be tested? YES (NO)
b. Methods of analysis? YES NO
c. Methods to get representative samples? YES NO
d. Testing frequency? YES NO

Comments:

3. Did inspector collect a copy of the Plan for a thorough review of it at EPA's offices? YES (NO) no plan available

4. Security

a. Have site owner/operators taken appropriate measures to ensure against unauthorized entry? YES (NO)

(1) Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by an approach? YES (NO)

(2) Are they legible from a distance of 25 feet or more? YES (NO)

(3) Does the facility have a 24-hour surveillance system or artificial or natural barrier/or combination of both, to control access to the active portion? (YES) NO

Comments: Wire fence surrounds the landfill area

5. Does the facility follow a Written Inspection Schedule (40 CFR 265.15? YES (NO)

Not a formal schedule - site checked once or twice a week

a. Does it include inspecting all:
Monitoring equipment? (YES) NO
Safety and emergency equipment? (YES) NO
Security devices? (YES) NO
Detecting equipment? (YES) NO

Dangerous waste storage areas? (YES) NO

b. Is this inspection schedule maintained at the facility? YES (NO)

c. Is an inspection log maintained? YES (NO)

(1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection? YES NO

(2) Does the log include:

(a) date of time of inspection? YES NO

(b) inspectors name? YES NO

(c) observations? YES NO

(d) date and nature of repairs? YES NO

Comments:

6. Personnel Training (40 CFR 265.16)

a. Has a training program been developed? (YES) NO
What Type? (Classroom/on-the-job)

Same as for PWT site see attached report

b. Does the program include contingency plan and response training? YES NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including: YES NO

(1) Procedures for using and maintaining equipment? YES NO

(2) Key parameters for automatic waste feed cut-off systems. YES NO

(3) Communications or alarm equipment YES NO

(4) Response to fire and explosions YES NO

(5) Response to ground water contamination incidents? YES NO

(6) Facility shut down? YES NO

d. Are records available at the facility for the following: see attached report for PWT

(1) Job title for each position related to hazardous waste management and maintaining equipment? YES NO

(2) Written job description for each job title? YES NO

(a) Does the job description include the skill, education or qualifications required for the position YES NO

(b) The duties assigned to that position? YES NO

(3) A written description of the type and amount of training to be given to those in each job position? YES NO

(4) A record of training completed or experience obtained for each job position by employee YES NO

(5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? YES NO

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? (YES) NO

   Explain:

2. Is internal emergency communication equipment or alarm systems installed? YES (NO)

   What type? No fire hazard or explosion hazard exists. Wastes not flammable or explosive.

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES (NO)

4. Are fire extinguishers or other emergency equipment immediately available on-site? YES (NO) not necessary

5. Is emergency communications and response equipment tested? YES ~~NO~~ N/A

   How often?

6. Is aisle space adequate for emergency response? (YES) NO Open field

   What is the aisle spacing?

7. Have any arrangements been made with local emergency response organizations? YES NO

8. Which organizations? See attached report for PWT

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? YES NO

   Explain

See attached report for PWT

D. Subpart D - Contingency Plan and Emergency Procedures 40 CFR 265.50

1.	Has contingency plan been developed? (It may be a modified SPCC plan)	YES NO
2.	Have incidents occurred where the plan has been implemented?	YES NO
3.	Have incidents occurred where the plan should have been implemented but was not	YES NO
	Explain	
4.	A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:	
	a. Does the plan describe actions to be taken by personnel in response to fire, explosion, or releases to the environment?	YES NO
	b. Does the plan describe arrangements made with external emergency response organizations?	YES NO
	c. Does the plan list those qualified to act as emergency coordinator including their name, address, and phone?	YES NO
	(1) Is the list current?	YES NO
	d. Is all emergency equipment available at the facility listed in the plan?	YES NO
	(1) Is the location and a description of the equipment included?	YES NO
	(2) Are capabilities described for each piece or equipment unit?	YES NO
	e. Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternative routes)?	YES NO

See attached report for PWT

f. Is a copy of the plan maintained at the active facility (versus main office)? YES NO

(1) Has a copy been supplied to appropriate off-site emergency response organizations? YES NO
To which?

5. Is at least one designated person <u>always</u> available to respond to emergencies (i.e., of those on the coordinator list)? YES NO
How are they available

6. What are the limits of this person's authority to respond to emergencies?

a. Has an emergency occurred? YES NO

b. Was the plan implemented? YES NO

c. (Describe the incident)

N/A not receiving waste

E. Subpart E - Manifest System, Recordkeeping, and Reporting 40 CFR 265.70

1. Manifest System

a. Upon receipt of a manifested hazardous waste shipment, does the TSD facility:

(1) Sign and date each copy of manifest receipt of certifying waste? YES NO

(2) Note any discrepancies on each copy? YES NO

(3) Give delivering transporter one signed and dated copy of the manifest? YES NO

(4) Send a S/D copy of the manifest to the generator within 30 days after delivery and? YES NO

(5) Retain a copy of each manifest at the facility for 3 years from delivery? YES NO

Does initiate shipment

b. If the TSD facility initiates a hazardous waste shipment, does it comply with generator requirements in Part 262? (YES) NO

c. Does the TSD facility examine manifests and wastes received to detect any significant discrepancies in quantity or type of waste, such as: (YES) NO

(1) Bulk waste-quantity variation of 10 percent or greater

(2) Batch waste - any variation in piece count

(3) Waste type - obvious differences discernible by inspection or waste analysis

d. If significant discrepancies are found, does the TSD facility:

(1) Reconcile discrepancies with generator or transporter within 15 days? or (YES) NO

(2) Immediately submit to EPA-RA a Discrepancy Report describing the discrepancy and attempts to resolve it and a copy of the manifest involved? (YES) NO

e. TSD facilities must keep a written operating record documenting the following details:

(1) Waste description and quantity received

(2) Methods and dates of its treatment, storage, and disposal

(3) The location and quantity of each HW at the facility

2. Operating Record No wastes received

a. Does the owner/operator of the facility maintain an operating record at the facility (40 CFR 265.73)? (YES) NO

b. Does the record contain the following information.

(1) A description of, and the quantity of each HW received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility? YES NO

(2) The location of each Hazardous Waste within the facility, and its quantity? YES NO

(3) A map showing disposal sites? YES NO

(4) Summary reports and details of all incidents that require implementing the Contingency Plan? YES NO

(5) Records and results of inspections as required (need only be kept three years)? YES NO

(6) All closure and post-closure cost estimates required for the facility? YES NO

(7) The results of testing and waste analysis? YES NO

Facility does have records of and location of wastes disposed in landfill.

3. Facility Reporting Procedures

a. Has the owner/operator prepared and submitted a single copy of the Annual Report to EPA by March 1 of each year? (YES) NO

b. Is owner/operator familiar with procedures for emergencies? (YES) NO

c. If a TSD facility accepts a regulated hazardous waste shipment without the required manifest or shipping paper, does it file an "Unmanifested Waste Report" within 15 days or receipt? YES NO

N/A does not receive waste.

F. Subpart F - Ground-Water Monitoring (40 CFR 265.90)

1. Are ground-water (GW) monitoring regulations required at this facility? (YES) NO

2. If YES, what is the relevant process unit?

   a. Surface impoundment ( )
   b. Waste pile ( )
   b. Land treatment ( )
   c. Landfills (✓)
   d. Other ( )
   Describe:

3. Has the owner/operator implemented a ground water monitoring plan? (YES) NO

4. If NO, has the facility implemented one of the following:

   a. GW Waiver [265.90(c)] ( )
   b. Alternate GW Monitoring System [265.90(d)] ( )
   c. Neutralization Waiver (265.90(e)] ( )
   d. Describe:

5. Does the ground water monitoring program consist of the following:

   a. At least 1 upgradient and 3 downgradient wells? YES NO
   b. GW Sampling and Analysis Plan YES NO
   c. GW sampling quarterly first year YES NO
   d. GW sampling semiannually after that YES NO
   e. Drinking Water Standards parameters YES NO
      Sampling frequency_____
   f. GW Quality parameters YES NO
      Sampling frequency_____
   g. GW Indicator parameters YES NO
      Sampling frequency_____
   h. GW elevation parameters YES NO
   i. Outline GW Quality Assessment Program YES NO
   j. Statistical Analysis of Indicator parameters YES NO

   Results:

System consists of leachate collection which is analyzed and shipped offsite to RCRA TSD (Crosby+Overton) No wells are at site according facility environmental affairs person. Lysimeters have been installed.

6. Has the facility implemented GW Quality Assessment program. YES (NO)

   a. Date:_____
   b. Results:

7. Does the facility maintain the necessary records. Will be assessed in CME to be done in August or Sept.

   a. Initial background parameter concentrations YES NO
   b. Subsequent parameters concentrations YES NO
   c. Statistical evaluations YES NO

8. Has the facility reported necessary information YES NO

   a. DW Standards for 1st year YES NO
   b. GW Indicator parameters annually YES NO
   c. Statistical evaluation YES NO

9. Comments:

G. Subpart G - Closure and Post-Closure (40 CFR 265.110)

Closure

1. Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? (40 CFR 265.117)

   a. Description of how and when the facility will be partially closed (if applicable) and finally closed? YES NO

   b. Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility? YES NO

   c. Description of the steps needed to decontaminate the facility equipment during closure? YES NO

   d. Comment:

Closure plan is currently undergoing EPA review. Facility had not received comments at the time of the inspection.

Post-Closure

2. Has the facility developed a post-closure plan which contains the following steps to safely care for the facility after closure/post-close of the facility? (40 CFR 265.117)

   a. Description of how post closure will be carried out for the next 30 years. ( ) ( )

   b. Notice to the local land authority within 90 days after closure is completed? ( ) ( )

   c. Notice in deed to property? ( ) ( )

H. Subpart H - Financial Requirements 40 CFR 265.140

1. Liability

a. (1) Does facility maintain liability insurance for sudden occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million? YES NO

(2) By what method did the owner/operator demonstrate sudden liability coverages to the RA?

(a) If HW facility liability endorsement(s) ( )

(b) If HW facility certificate(s) of liability insurance ( )

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mechanisms (specify) (X)

Trust

2. If a surface impoundment, landfill, or land treatment exist at the facility,

b. (1) does facility maintained liability insurance for nonsudden occurrence in the amount of at least $3 million per occurrence with an annual aggregate of at least $6 million? YES NO

(2) By what method did the owner/operator demonstrate non-sudden liability coverage to RA?

(a) HW facility liability endorsement(s)' ( )

(b) HW facility certificate(s) of liability insurance' ( )

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mehcanisms (specify) (X)

Trust

c. Has owner/operator submitted an originally signed duplicate of liability coverage demonstration to RA?

d. Is wording of liability coverage instruments identical to that specified in 40 CFR 264.51?

YES NO

Comment:

2. Assurance

a. Closure

(1) Has facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan (40 CFR 265.112)? Yes NO

plan in review by EPA.

(2) Is this cost estimate adjusted annually for inflation? YES NO

(3) Has facility established financial assurance for the closure of the facility (40 CFR 265.143)? YES NO

(4) By what method has this been achieved:

(a)	Trust fund	(X)
(b)	Surety bond (with standby trust)	( )
(c)	Letter of credit (with standby trust)	( )
(d)	Insurance	( )
(e)	Financial test	( )
(f)	Corporate guarantee	( )
(f)	Multiple mechanisms	( )

(5) Has facility submitted an originally duplicate of financial assurance to RA? YES NO

not evaluated

(6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151 YES NO

(7) Comment:

b. Post-Closure (Disposal Facilities)

not evaluated plan in review by EPA.

(1) Has facility prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (40 CFR 265.144)? YES NO

(2) Is this cost estimate inflation adjusted annually YES NO

(3) Has owner/operator established financial assurance for the post-closure care of the facility (40 CFR 265.145)? YES NO

(4) By what method has this been achieved:

(a)	Trust fund	( )
(b)	Surety bond (with standby trust)	( )
(c)	Letter of credit (with standby trust	( )
(d)	Insurance	( )
(e)	Financial test	( )
(f)	Corporate guarantee	( )
(g)	Multiple Mechanisms	( )

not evaluated plan in review by EPA

8. Has owner/operator submitted an originally signed duplicate of financial assurance to Regional Administrator? YES NO

9. Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151? YES NO

I. Subpart I Use and Management of Containers (40 CFR 265.170)

1. Does this section apply to this facility? YES NO

2. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES NO

3. Are the containers always closed, except to add or remove waste? YES NO

4. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES NO

5. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO

6. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO

7. Is the facility aware of and complying with the following requirements for incompatible wastes:

   a. Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO

   b. HW must not be placed in an unwashed container that previously held an incompatible waste YES NO

   c. Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO

      Explain?

8. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES NO

9. Comments:

J. Subpart J - Tanks (40 CFR 265.190)

1. Does this section apply to this facility? (YES) NO

2. Do tanks on the facility hold hazardous waste? (YES) NO

   If so, what are their contents? leachate collected from landfill

3. Is storage in tanks conducted such that:

   a. It does not generated heat, pressure, fire, explosion or violent reaction? (If no, explain) (YES) NO

   b. It does not produce uncontrolled toxic mists, fumes, dusts, or gases? (If no, explain) (YES) NO

   c. It does not produce uncontrolled flammable fumes or gases? (YES) NO

   d. It does not damage the tank? (YES) NO

   e. It does not threaten the environment in other ways (i.e., leaks, spills)? (YES) NO

   Comments:

4. Is 2 feet of freeboard maintained in uncovered tanks? (YES) NO — most of the time,

   If no, is secondary containment used? YES (NO)

   (Explain)

5. Is the tank(s) continuously fed? (YES) NO

   If yes, is there a means to stop inflow? YES (NO)

   Explain

6. Are Hazardous Waste storage tanks operated in a manner which minimizes the possibility of overfilling? (YES) NO

   How:
   Waste feed cut-off ( )
   Bypass system to another tank ( )
   High level alarm ( )
   Other Regular visual checks

7. Are inspections of the following conducted:

   a. Discharge control equipment? N/A YES NO
      How often?

   b. Waste feed cut-off systems? N/A YES NO
      How often?

   c. Data from tank monitoring equipment? N/A YES NO
      How often

   d. The level of waste in the tank? (YES) NO
      How often? Weekly

   e. The structural integrity of tank? (YES) NO
      How often? Weekly
      How are inspections conducted? Visually
      What is observed (looked for)?

   f. The immediate area around the tank for signs of leaks and the integrity of secondary containment (if any)? (YES) NO

8. Have any tanks once used for storage of hazardous waste been closed or their function changed? When? NO

   a. Were all hazardous wastes and/or residues removed? YES NO

   b. What was the disposition of the wastes or residues (i.e., where did it go)? YES NO

   c. When shipped?

9. Are ignitable or reactive wastes placed in tanks? YES (NO)

10. If yes, what measures are used to prevent ingnition or reaction?

11. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue? YES (NO)

12. If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements? N/A YES NO

13. Are "No Smoking" signs posted? N/A YES NO

14. Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks? N/A YES NO

Explain

15. Waste Analysis and Trial Tests

Before treating and storing of hazardous waste in a tank is a detailed chemical and physical analysis of the waste obtained? YES (NO)

16. Does the company have and follow a written waste analysis plan? YES (NO)

a. Does the plan identify parameters used? YES NO

Explain

b. Sampling Method? YES NO

Explain

c. How frequent is analysis repeated? YES NO

d. Are results of waste analysis and trial tests placed in the facility's operating record.

17. Are waste analyses done when a tank is used to treat or store a HW which is substantially different or treated differently from waste previously treated or stored in the tank? N/A YES NO

N/A no surface impoundments

K. Subpart K - Surface Impoundments (40 CFR 265.220)

1. Does this section apply to this facility? YES NO

2. Does the surface impoundment maintain enough freeboard to prevent any overtopping of the dike by overfilling, wave action, or a storm? YES NO

3. Are the surface impoundments designed and operated to allow two feet of freeboard? YES NO

4. Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)? YES NO

5. Is a waste analysis or trial test conducted whenever a surface impoundment is used to chemically treat a HW which is substantially different or treated differently from waste previously treated in the surface impoundment? YES NO

6. Are results of waste analyses documented in the facility's operating record? YES NO

7. Are the surface impoundments inspected on a routine basis? How often? YES NO

8. Are ignitable or reactive wastes held in a surface impoundment (40 CFR 265.229)? YES NO

9. Comments:

The following 40 CFR Subparts do not have a specific checklist prepared because few of these types of facilities exists in Region X. Inspection made at facilities which operate any of the following would require the inspector to prepare an inspection checklist prior to the site visit.

L. Subpart L - Waste Piles (40 CFR 265.250)
M. Subpart M - Land Treatment (40 CFR 265.270)
N. Subpart N - Landfills (40 CFR 265.300)
O. Subpart O - Incinerators (40 CFR 265.340)
P. Subpart P - Thermal Treatment (40 CFR 265.370)
Q. Subpart Q - Chemical, Physical, and Biological Treatment (40 CFR 265.400)
R. Subpart R - Underground Injection (40 CFR 265.430)

VI. Treatment, Storage, and Disposal (TSD) Permit Regulations (40 CFR 264) (Date Revised November 21, 1983)

This Part of the checklist does not have a specific checklist prepared because the checklist would be different for each facility. A compliance inspection made at a facility which has been issued a Part B Permit needs to have checklist and/or narrative which reviews all of the requirements of the facility's Permit. This checklist and/or narrative needs to be developed by the individual inspector.

HSWA Requirements

Loss of Interim Status (§270.73)

	YES	NO	COMMENTS
no units are receiving any waste at this time. 1. For any units that lost Interim Status on Nov. 8, 1985, are any of those units still accepting RCRA hazardous waste?			
a. Which ones?			
b. What is the specific proof that the waste is RCRA-regulated? (obtain copies of on-site representative waste analyses; operating record showing discharges to unit; or any written documentation to clearly verify that the waste is RCRA-regulated).			
2. If the facility has ceased accepting hazardous waste, what was the last date on which RCRA hazardous waste was placed in such unit(s)? Where is this documented?			1/24/83 in Ecology's file in a letter from the facility.
3. Are any of the RCRA units now accepting waste that is non-hazardous or regulated only by the State?			no
a. What is the evidence that the waste is not RCRA-regulated? (obtain copies of variances, waste analyses, etc.).			N/A no waste is received
4. If the facility is no longer receiving hazardous waste in a land disposal unit, please explain how the facility is currently managing their hazardous waste (e.g., tanks, discharge to sewer, etc.)			landfill has been closed and capped with clay. Leachate is being collected in a tank and shipped to Crosby + Overton.

HSWA Requirements

	YES	NO	COMMENTS
Underground Tanks			No underground tanks
1. If an underground product storage tank has been installed since May 7, 1985, does it comply with the following standards:			
a. Will it prevent releases due to corrosion or structural failure for the operational life of the tank (280.2(a)(1))?	___	___	
b. Is it cathodically protected against corrosion, constructed of non-corrosive material, or designed in a manner to prevent the release or threatened release of any stored substance (280.2(a)(2))?	___	___	
c. Is it constructed or lined with material that is compatible with the substance to be stored (280.2(a)(3))?	___	___	
2. Did the facility notify the State (or EPA if on Indian lands) by May 8, 1986, of any tank(s) in the ground as of January 1, 1974 (280.3)?	___	___	

HSWA Requirements

	YES	NO	COMMENTS
Part 266, Subparts D and E			
Prohibitions			
1. Are mixtures of hazardous waste and used oil used for dust suppression (266.23)?		N/A	no used oil at site
2. Is any hazardous waste fuel or off-specification used oil fuel burned in restricted (non-industrial) boilers or furnances (266.31(b) and 266.41(b))?			
3. If the facility is a cement kiln located within the boundaries of a municipality of population greater than 500,000, and is not operating as a RCRA incinerator, are they burning hazardous waste fuel (266.31)?			not a cement kiln
Notification			
1. Is the facility engaged in any of the following activities with respect to either used oil fuel or hazardous waste fuel 266.34 and 266.43:			
a. marketing?		X	
b. processing?		X	
c. burning?		X	
If not, Part 266, Subparts D & E do not apply.			
2. If so, has the facility notified EPA of those waste-as-fuel activities in addition to their original notification (266.34 b), 266.35, 266.43(b), and 266.44)?		N/A	

	YES	NO	COMMENTS
Storage			
If the facility handles hazardous waste fuel, is it stored in compliance with Part 265 (266.34(c))? (Effective 5/29/86)			N/A
Recordkeeping			
A. Used Oil Fuel (UOF):			
1. If the facility is the first marketer to claim that the used oil fuel meets all the specifications listed in 266.40(e), do they have records of the analyses (or other adequate information) to document that claim (266.43(b)(6))? (Lead specification is not effective until 5/29/86)			N/A
2. Does all off-specification UOF meet the rebuttable presumption of mixing with hazardous waste (1,000 ppm total halogen) (266.40(c))? If not, the fuel is considered a hazardous waste fuel and must be handled as such. (See (B) below)			
3. Does the facility have copies of invoices for all off-spec. shipments sent or received (266.43(b)(6) and 266.44(e)? (Effective 3/31/86)			UOF

	YES	NO	COMMENTS
4. If the facility markets to a burner, or is itself a burner, do they have on record a copy of the burner's certification that they have notified EPA of waste-as-fuel activities and will only burn in unrestricted boilers or furnaces (i.e., industrial boilers and furnaces burning to recover useful heat energy, as specified in 261.41(b)), (266.43(b)(6) and 266.44(e))? (Effective 3/31/86)		N/A	
B. Hazardous Waste Fuel (HWF):			
1. Does the facility have records of manifests for all shipments of hazardous waste fuel sent out or received (262.40, 264.71(a), and 265.71(a))? (Effective 3/31/86)		N/A	
2. If the facility markets to a burner or is itself a burner, is there, on record, a copy of the burner's certification that they have notified EPA of waste-as-fuel activities and will only burn in unrestricted boilers and furnaces (i.e., industrial boilers and furnances burning to recover useful energy, as specified in 266.31(b)), (266.34(f) and 266.35(e))?			

HSWA Requirements

	YES	NO	COMMENTS
Part 262			
1. If the facility generates between 100 and 1,000 kg/ month, are all shipments off-site accompanied by a manifest (261.5)?	X	—	
2. Does the generator sign the waste minimization certification on the manifest (Part 262, Appendix)?	X	—	
3. Did the facility submit the required annual report on exports (due 3/1 each year) (262.50(d)?	—	—	no exports
4. Does the operating record contain an annual certification by the permittee that:			
a. There is, to the extent economically practicable, a program in place to reduce the volume and toxicity of the hazardous waste that generates? and	X	—	
b. The proposed method of treatment, storage, or disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment (264.73(b)(9))?	X	—	

HSWA Requirements

Prohibition on Land Disposal of Liquids

	YES	NO	COMMENTS
1. Is the facility disposing of any noncontainerized or bulk liquid hazardous waste in any salt dome formation, salt bed formation, underground mine or cave (264.18(c) and 265.18)?	___	X	
2. Is the facility landfilling any bulk or non-containerized liquid hazardous waste or free liquids contained in hazardous waste (266.314(b) and 265.314(b))?	___	X	
3. Is the facility landfilling any non-hazardous liquid without approval of the Regional Administrator (264.314(e) and 265.314(e))?	___	X	

HSWA Requirements

Parts 264 & 265 - Minimum Technological Requirements

	YES	NO	COMMENTS
A. Landfills and Surface Impoundments			
1. With respect to any surface impoundment or landfill, does the facility have any new unit, replacement of an existing unit or expansion of an existing unit which first received waste:			
After 11/8/84 and continued receiving waste on or after 5/8/85 (for facilities operating under Interim Status)?	___	X	
After the date of permit issuance (for facilities which received a permit after 11/8/84)?	___	X	
If no, this section does not apply.			
2. a. For any landfill, has the unit been granted one of the variances in §264.301(d) or (e) or §265.301(c) or (d)?	___	N/A	
b. For any surface impoundment, has the unit been granted one of the variances in §264.221(d) or (e) or §265.221(c) or (d)?	___	___	
If the unit has been granted one of the above variances, this section does not apply.			

	YES	NO	COMMENTS
3. Does such unit comply with the following minimum technological requirements (265.221(a) and 264.221(c) for the surface impoundments, and 265.301(a) and 264.301(c) for landfills):			N/A
a. Is the unit lined with two or more liners?			
b. For surface impoundments, is there a leachate collection system installed between the liners (265.221(a))?			
c. For landfills, is there a leachate collection system installed above and between the liners (265.301(a)?			
d. Is the top liner designed, operated, and constructed of materials to prevent the migration of any constituent, into such liner during the period the facility remains in operation (including any post-closure monitoring period)?			
e. At a minimum, is the lower liner constructed of at least a 3-foot thick layer of recompacted clay or other material with a permeability of no more than 1×10^{-7} cm/sec.?			
f. Do the liners and leachate collection extend to any area of such unit that is in contact with the waste?			

	YES	NO	COMMENTS
4. For interim status landfills (265.301(b)) and surface impoundments (265.221(b)) that are subject to the above minimum technological requirements:			N/A
a. Was EPA notified at least sixty days prior to the first date on which such unit received waste?			
b. Did the facility submit their Part B permit application within six months of EPA's receipt of that notice?			
B. Waste Piles			no waste pile
1. With respect to any interim status waste piles, does the facility have any new unit, replacement of an existing unit or expansion of an existing unit which first received waste after 11/8/84 and continued to receive wastes on or after 5/8/85 (265.254)?			
If no, this section does not apply.			N/A
2. For any such waste pile that has not been granted a variance under 264.250(c) or 264.251(b), does such waste pile meet 264.251(a) liner and leachate control system requirements (265.254)?			

HSWA Requirements

Corrective Action Program Development

1. Does the facility have SWMU's?
Assign each yes response a consecutive number. Describe unit in comments section.

		YES	NO	COMMENTS
1.	Landfill	X		closed landfill unit
2.	Surface Impoundment			
3.	Land Farm			
4.	Waste Pile			
5.	Incinerator			
6.	Storage Tank (above ground)			
7.	Storage Tank (below ground)			
8.	Container Storage Area			
9.	Injection Wells			
10.	Wastewater Treatment Units			
11.	Transfer Stations			
12.	Loading/Unloading Areas			
13.	Waste Recycling Operations			
14.	Waste Treatment Units			
15.	Waste Detoxification Units			
16.	Others			

2. Is there any indication of a possible release?
(seeps, discolored soil, stressed vegetation, etc)

1.	SWMU 1		X	
2.	SWMU 2			
3.	SWMU 3			
4.	SWMU 4			
5.	SWMU 5			
6.	SWMU 6			
7.	SWMU 7			

3. Have any monitoring, sampling, closure activities or mitigation efforts occured at any of the SWMU's? Attach copies of reports and data.

1.	SWMU 1	X		A clay cap has been placed on unit.
2.	SWMU 2			
3.	SWMU 3			
4.	SWMU 4			
5.	SWMU 5			
6.	SWMU 6			
7.	SWMU 7			

ANDREA BEATTY RINIKER
Director

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
7272 Cleanwater Lane, LU-11 • Olympia, Washington 98504-6811 • (206) 753-2353

June 8, 1987

Mr. Bryant Adams
P.O. Box 518
Ridgefield, Washington 98642

Dear Mr. Adams:

Dangerous Waste (DW) Compliance Inspection at
Pacific Wood Treating Corp., Ridgefield, ID #WAD009422411

Thank you for your assistance during the recent dangerous waste compliance evaluation inspection of Pacific Wood Treating Corp., Ridgefield on April 23, 1987.

The purpose of the inspection was to determine the facility's compliance with state dangerous waste regulations (WAC 173-303). The inspection consisted of a tour of the facility, a review of all hazardous waste documents and records required to be kept at the plant, and completion of the compliance checklist/ questionnaire.

Pacific Wood Treating has not conducted any known hazardous waste treatment, storage, or disposal (TSD) activities for approximately four years, and no TSD activities were observed during this inspection. Current DW activity on-site consists of K001 sludge generation and accumulation for less than 90 days. All wastes are shipped off site. For these reasons, this inspection addressed only the requirements for hazardous waste generators.

Gary Bickett, from the Southwest Washington Health District, accompanied us during the first hour of the inspection, which you hosted as the plant's environmental engineer. During my visit I viewed the lumber sheds, storm water management system, incinerator, waste water treatment system, lab, storage tanks, wood preserving facilities, and hazardous waste handling areas. The weather was warm and clear.

During the inspection, it was obvious that the facility's management and staff have been making a conscientious effort to prevent hazardous waste releases and to meet state and federal requirements.

A copy of the questionnaire form used to determine compliance has been enclosed to provide detailed explanation of my observations. Please note the following areas of incomplete compliance:

1. WAC 173-303-060 Notification. The Part A submitted for this facility must be revised to reflect changes in waste operations. Sludge is no longer being generated from the boiler blowdown water (formerly listed as

D002). If you do not anticipate generating the former WT02 wood adhesive wastes in the future, this must also be removed from the notification. If process waste waters containing PCP or creosote constituents is being fed to the experimental biological treatment system, then the sediments and biological solids generated in that system must be handled as K001 wastes. A revised Part A has been enclosed for immediate revision and resubmittal.

2. WAC 173-303-350 and 360 Contingency Plan and Emergency Procedures. The facility's Spill Prevention, Control and Countermeasure Plan (SPCC) should be an easily handled document which contains the Contingency Plan as a subsection. Instructions on inspecting and maintaining the emergency equipment must be included in the Contingency Plan. Please reorganize the SPCC and Contingency Plans in this manner within 90 days.

3. WAC 173-303-200(7) Spill Containment. Though it does not appear necessary to continue to use the sand bag berm for the drums of solidified waste, a better catchment system is needed around the drum "press" nearby. The metal pan currently being used for this purpose is too small for this activity. Please revise this containment within 90 days.

The enclosed Certificate of Compliance Form must be completed and returned to this office by September 1, 1987. Should you have questions concerning it, please don't hesitate to telephone me (753-0147). Thank you again for your cooperation during this inspection.

Sincerely,

Judy Belcher

Judy Belcher
Regional Hazardous Waste Engineer

JB:ss(2/4)

Enclosures

cc: Gale Blomstrom, WDOE
Gary Bickett, Southwest Washington Health District

Please complete and return this form to Judy Belcher, Washington Department of Ecology, Southwest Regional Office, 7272 Cleanwater Lane, Mail Stop LU-11, Olympia, Washington 98504, by September 15, 1987.

CERTIFICATE OF COMPLIANCE

As a legal representative of Pacific Wood Treating Corporation, I certify that to the best of my knowledge, the compliance status at our hazardous waste facility located at Ridgefield, Washington, Facility I.D. No. WAD009422411 is as shown below.

Items of Noncompliance	Category I, II, III	Compliance Date	Compliance Status (Check One) Complied	Not Complied	Comments
-060 Notification	III	Immediate			
-350, -360 Emergency Plans	III	September 1, 1987			
-200(7) Containment	II	September 1, 1987			

_____
(Signature)

_____
(Printed Name)

_____
(Title)

_____
(Date)

DANGEROUS WASTE COMPLIANCE CHECKLIST/QUESTIONNAIRE, CHAPTER 173-303 WAC

****

PART 1: COVER INFORMATION

This part of the checklist/questionnaire is applicable to all persons who handle dangerous waste. This cover information includes a review of the Notification Form and confirmation of other general information necessary to maintain accurate files and records.

****

I. INSPECTOR INFORMATION

WDOE Inspector: Judy Belcher

: _____

Phone: 753-0147

: _____

Office (circle one): NW (SW) C E IND

Date of THIS Inspection: _____

Date of LAST Inspection: June 28, 1985

Other Inspectors Present:

Name: Gary Bickett Agency: local health Phone #: 696-8428

: _____ : _____ : _____

INSPECTION TYPE

Generator functionally

Transporter _____

TSDF officially

Scheduled ✓

Drop-in _____

RCRA ✓

State-only _____

2. BUSINESS INFORMATION

Business Name: Pacific Wood Treating Corp. EPA/State ID #: WAD009 422411

Address: 111 West Division Street
P.O. Box 518
Ridgefield, WA 98642

Zip Code: 98642 County: Clark

Business Location (If: _____

Other Than Address) _____

Contact Person: Vince McQuigeen Phone #: 887-3562

: Bryant Adams : 887-3562

Business Representative Present During Inspection:

Name: Bryant Adams Title: Envir. Engineer Phone #: _____

: Ed Ryf : Plant manager : _____

: Paul Peck : Treating Foreman : _____

3. NOTIFICATION FORM REVIEW

Notification Form Filed: Yes ✓ No ____ Date: 3-29-85

Notification Form Revisions: Yes ____ No ____ Date: _____

Date: _____

Date: _____

Is the information provided in the most recent Notification Form still accurate? (If not, note any deficiencies in Comments, below.) Yes ____ No ____

Comments: Boiler sludge now neutralized and discharged under NPDES. Rarely producing WTO2.

4. ADDITIONAL INSPECTION INFORMATION

Time Inspector Entered Site: 1000 4-23-87

Left Site: Approx 1530 4-23-87

Were photographs taken during the inspection? Yes ✓

If yes, how many? 7 No ____

(Note: A brief description of the pictures should be prepared and included in the inspection report.)

Were many problems encountered regarding:

Permission to enter the site: _____

Permission to have access to any areas on the site: _____

Permission to have access to any records: _____

Other: _____

Were samples taken during the inspection? Yes ____
No X

If yes, where and of what were samples taken:

_____

_____

_____

_____

Were samples split with the owner/operator? Yes ____
No ____

Were chain of custody procedures followed? Yes ____
No ____

DANGEROUS WASTE COMPLIANCE CHECKLIST/QUESTIONNAIRE, CHAPTER 173-303 WAC

****

PART 1: COVER INFORMATION

This part of the checklist/questionnaire is applicable to all persons who handle dangerous waste. This cover information includes a review of the Notification Form and confirmation of other general information necessary to maintain accurate files and records.

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I. INSPECTOR INFORMATION

WDOE Inspector: Judy Belcher

: _____

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Business Representative Present During Inspection:

Name: Bryant Adams Title: Envir. Engineer Phone #: ______

: Ed Tcyf : Plant manager : ______

: Paul Peck : Treating Foreman : ______

3. NOTIFICATION FORM REVIEW

Notification Form Filed: Yes ✓ No ____ Date: 3-29-85

Notification Form Revisions: Yes ____ No ____ Date: ______

Date: ______

Date: ______

Is the information provided in the most recent Notification Form still accurate? (If not, note any deficiencies in Comments, below.) Yes ____ No ____

Comments: Boiler sludge now neutralized and discharged under NPDES. Recycling WTDS.

4. ADDITIONAL INSPECTION INFORMATION

Time Inspector Entered Site: 1000 4-23-87

Left Site: Approx 1530 4-23-87

Were photographs taken during the inspection? Yes ✓ No ____

If yes, how many? 7

(Note: A brief description of the pictures should be prepared and included in the inspection report.)

Were many problems encountered regarding:

Permission to enter the site: ______

Permission to have access to any areas on the site: ______

Permission to have access to any records: ______

Other: ______

Were samples taken during the inspection? Yes _____
No X

If yes, where and of what were samples taken:

_____

_____

_____

_____

Were samples split with the owner/operator? Yes _____
No _____

Were chain of custody procedures followed? Yes _____
No _____

DANGEROUS WASTE COMPLIANCE CHECKLIST/QUESTIONNAIRE, CHAPTER 173-303 WAC

* *

PART II: GENERATORS

This part of the checklist/questionnaire is applicable to any person whose actions or processes generate dangerous wastes, and are thus identified as generators under Chapter 173-303 WAC. This part of the checklist/questionnaire must be completed for any person who is a generator, including transporters or TSD facilities which generated dangerous waste.

* *

Generator Name: Pacific Wood Treating Corp. EPA/State ID #: WAD009422411

Inspectors Name: Judy Belcher Date: April 23, 1987

Has this generator generated dangerous waste since the date of his last inspection, or since the date he was determined to be a generator if this is his first inspection? (If "No," explain how the generator assures that no dangerous wastes are generated in the Comments section, below, and do not complete the remainder of this part of this checklist/questionnaire.)

Yes ✓

No ___

Comments: _____

		Yes	No
1.	WASTE DETERMINATION (WAC -016 and -017)		
A.	Has the generator properly determined which of his secondary materials are solid wastes under WAC 173-303-016?	✓	___
B.	Does the generator generate secondary materials to be used in a manner constituting disposal, burned for energy recovery, accumulated speculatively, or which are inherently waste-like?	___	✓
	If yes, the following three exemptions do not apply.		
C.	Does the generator use or reuse secondary materials as ingredients in an industrial process to make a product		

provided the materials are not being reclaimed? — ✓

D. Does the generator use or reuse secondary materials or effective substitutes for commercial products provided the materials are not being reclaimed? — ✓

E. Does the generator return secondary materials as raw material feedstock to the original process from which they were generated without first being reclaimed? ✓ —

F. If the generator has claimed that any of his materials are not wastes, can the generator demonstrate and provide documentation that a known market or disposition for the material exists and that he meets the terms of the exemption or exclusion? NA —

	Yes	No
2. DESIGNATION (WAC -170(1)).		
A. Does the generator properly designate his dangerous wastes as DW and/or EHW?	✓	—
B. Does the generator have adequate information to perform these designations?	✓	—
C. If designation involves performing tests and analyses of his wastes:		
a. Does the generator have on-site, or have ready access to, equipment for obtaining and preserving waste samples for tests?	✓	—
b. Do the waste analyses and test results provide enough information to accurately designate the generator's dangerous wastes (WAC -170(1)(a))?	✓	—
c. Does the generator retain copies of all waste analyses used to designate his dangerous wastes for a minimum of three years (WAC -210(3))?	✓	—

Comments _____

3. RECYCLING ACTIVITIES

	Yes	No
A. Are any of the generator's wastes recycled?		NA

If no, skip this section (3) and continue with section 4.

If yes, the recyclable material may fall into one of three categories:

- o It may be "exempt" under WAC 173-303-016, -017, -071, or -120(2);
- o It may be subject to special standards under 173-303-500 through 173-303-525; or
- o Where no special standards exist, any storage prior to recycling is fully regulated either under the usual generator accumulation or facility storage provisions, while the recycling process itself is not regulated. (WAC -120(4))

The remainder of this section identifies those recyclable materials for which special standards exist. REMINDER: These special standards apply to the recycling of dangerous wastes. Certain recycling practices do not involve wastes at all.

B. Used Oil

a. Does the generator generate used oil to be burned for energy recovery? NA

If yes, the generator standards do not apply to these wastes (although marketer and/or burner standards may apply).

b. Does the generator burn their own or do-it-yourselfer used oil in used oil-fired space heaters with a maximum capacity of not more than .5 million Btu per hour, which is vented to the outside air?

If yes, neither the generator or burner standards apply to these wastes.

c. Does this person market used oil directly to a person who burns it for energy recovery?

i. For persons marketing used oil that meets the specifications, are records maintained for at least three years of test results (or other information) to document that the used oil meets all of the specifications in Table 1 of WAC -515(1)? (WAC -515(4)(b)(i))

Does the marketer also record in an operating log and keep for three years the following

information on each shipment of used oil that meets the specifications:

name and address of receiving facility;
quantity of used oil delivered;
date of shipment or delivery; and
cross-reference to the record of test analyses or other information used to make the determination that the oil meets the specifications?
(WAC -515(4)(b)(vi)(A))

NA

ii. Does the marketer market off-specification used oil only to industrial facilities, boilers, or other marketers? (WAC -515(2)(a))

iii. Has the marketer notified WDOE of his used oil management activities?
(WAC -515(4)(b)(iii))

iv. When a marketer initiates a shipment of off-specification used oil, does he prepare and send to the receiving facility an invoice containing at least:

an invoice number;
the marketer's and receiving facilities' ID#s, names and addresses;
quantity of used oil
date(s) of shipment or delivery; and
a statement that the used oil is subject to WDOE regulation under WAC 173-303-515?
(WAC -515(4)(b)(iv))

v. Before first shipment of off-specification used oil to a burner or other marketer, does the marketer obtain a written and signed notice from the burner or marketer certifying that:

- o the burner or marketer has notified WDOE of his activities, and
- o if a burner, will burn the off-specification used oil in an industrial furnace or boiler?

vi. Before a marketer accepts the first shipment of off-specification used oil from another marketer, does he provide the other marketer with a one-time written and signed notice certifying that he has notified WDOE of his used oil management activities?
(WAC -515(4)(b)(v)(B))

vii. Does the marketer keep records of invoices and certification notices for shipments of off-specification used oil at least three years?
(WAC -515(4)(b)(vi)(B))

C. Spent-lead Acid Batteries

	Yes	No
Does the generator generate spent-lead acid batteries destined for recycling?	NA	
If yes, the generator standards do not apply to these wastes.		

D. Precious metals

	Yes	No
Does the generator generate precious metals (i.e., gold, silver, platinum, paladium, irridium, osmium, rhodium, ruthenium, or any combination of these) destined for recovery?	—	—
If yes, only the next two questions apply.		
a. Does the generator have an ID#? (-525(1)(b)(i))	—	—
b. Does the generator comply with the manifest requirements of WAC 173-303-180? (-525(1)(b)(ii))	—	—
Complete Section 3 of this Part (II) to determine this.		

E. Fully regulated

	Yes	No
Does the generator generate:		
i. dangerous waste to be burned for energy recovery?	—	—
ii. recyclable materials that become products used by the general public in a manner constituting disposal?	—	—
iii. state-only wastes to be recycled?	—	—
iv. any other recyclable materials not exempt under WAC 173-303-017 or 173-303-071?	—	—
If yes to any of these questions, then full generator requirements apply. Complete the rest of this Part (II).		

Comments _____

_____

_____

_____

4. SHIPPING DANGEROUS WASTE OFF-SITE

	Yes	No
A. Does the generator ship any dangerous wastes off-site that must have accompanying manifests as required under WAC -180? (If "No," do not complete Section 5. Manifests, Section 6. Preparing Dangerous Waste for Transport, and Section 7. Import/Export of Dangerous Waste.)	✓	—

B. Does the generator ever also transport his own wastes? (If "YES" be sure to also complete Part III: Transporters of this checklist/questionnaire.)

Yes	No
—	✓

C. List below any "outside" transporters the generator uses to transport his dangerous wastes off-site:

Transporter Name	EPA/State ID #
Pegasus Waste Management	ORD 980979777
Dart Trucking Co	OH D00 9865825
Chem Security Systems	ORD 08945 2353

Comments _____

5. MANIFESTS (WAC -180).

	Yes	No
A. Does the generator retain a completed copy of each manifest signed by the initial transporter for at least three years, or until he receives a signed copy from the designated facility indicating receipt of the waste which copy he keeps for at least three years from the date the initial transporter accepted the waste (WAC 210(1))?	✓	—
B.a Does the generator use an alternative manifest mechanism for moderate risk wastes as provided in WAC -170(4)(a)?	NA	
b. Has this alternative manifest mechanism been approved by WDOE?	NA	
c. Has the generator complied with the terms and conditions of, and properly implemented the alternative manifest mechanism? (If not, specify what failures occurred under Comments, below.)	NA	

Note: If all of the dangerous wastes handled by the generator are moderate risk wastes covered by an alternative manifest mechanism, then complete only items G., H., I,, and J,, below. If only some of the generator's dangerous wastes are moderate risk wastes covered by an alternative manifest mechanism, then do complete all remaining items, below.

		Yes	No
C.	Does the generator use the Uniform Manifest (WAC -180(1))?	✓	
	Does the generator include the additional WDOE information required for the Uniform Manifest.		
	a. In Item D - the first transport's telephone number (WAC -180(1)(a))?	✓	
	b. In Item F - the second transporter's telephone number, if a second transporter is used (WAC -180(1)(b))?	✓	
	c. In Item H - the designated receiving facility's telephone number (WAC -180(1)(c))?	✓	
	d. In Item I - the dangerous waste number for each corresponding waste entered and described under Item 11 (WAC -180(1)(d))?	✓	
D.	Is signature of, and date of acceptance by the transporter obtained prior to transport (WAC -180(3)(a))?	✓	
E.	Does the generator retain one copy, signed by the transporter, and give remaining copies to the transporter at time of transport (WAC -180(3)(a) and (b))?	✓	
F.	Has the generator received copies of all his manifests, signed, dated, and returned by the receiving TSD facilities?	✓	
	Were <u>all</u> of these received within forty-five days after the waste was transported? (If "Yes," do not complete the next item, G., regarding Exception Reports.)	✓	
G.a.	If the generator does not receive a copy of the manifest with the handwritten signature of the designated facility's owner/operator within thirty-five days after the initial transporter accepted the waste, does he contact the transporter(s) and/or facility to determine the status of the dangerous waste shipment (WAC -220(2)(a))?	✓	
	b. Has the generator submitted in writing to WDOE an Exception Report for each manifest not signed, dated, and returned by the receiving TSD facility within forty-five days of transport (WAC -220(2))?		✓

c. List the dates during the previous year that Exception Reports were submitted: None

d. Were the waste shipments described in these Exception Reports finally delivered to a TSD facility? If not, specify which shipments were not delivered or not found: — Yes / — No / NA

_____

_____

_____

e. Does the generator retain copies of all Exception Reports for a minimum of three years (WAC -210(2))? NA

H. If the transporter is unable to deliver the dangerous waste shipment to either the designated or alternate facility, does the generator either designate another facility for delivery or instruct that the shipment be returned to him when contacted by the transporter for further instructions (WAC -180(3)(c))? ✓

I. When shipping dangerous waste within the United States solely by water (bulk shipment), does the generator send three copies of the manifest signed and dated by himself and the initial transporter to either the owner/operator of the designated facility, or to the last water transporter to handle the waste in the U.S. if the waste is exported by water (WAC -180(3)(d))? NA

J. For rail shipments within the United States which originate at the site of generation, does the generator send at least three copies of the manifest signed and dated by himself and the initial transporter to either (WAC -180(3)(e)):

a. The next nonrail transporter, if any? NA

b. The designated facility if transported solely by rail? +

c. The last rail transporter to handle the waste in the U.S. if exported by rail? —

Comments _____

_____

_____

_____

_____

_____

6. PREPARING DANGEROUS WASTE FOR TRANSPORT OFF-SITE (WAC -190).

	Yes	No
A. Does the generator package his dangerous waste for transport in accordance with U.S. DOT rules, 49 CFR Parts 173, 178 and 179 (WAC -190(1))?	✓	
B. Does the generator label and mark each of his packages for shipment in accordance with U.S. DOT rules, 49 CFR Part 172 (WAC -190(2) and (3)(a))?	✓	
C. Does the generator mark each package containing 110 gallons or less of dangerous waste, and display in accordance with 49 CFR 172.304, the following or equivalent words and information (WAC -190(3)(b)): HAZARDOUS WASTE - State and Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology or the United States Environmental Protection Agency. Generator's Name and Address _____.		
Manifest Document Number _____.	✓	
D. Does the generator placard, or offer to the transporter all appropriate placards, in accordance with U.S. DOT rules 49 CFR Part 172 Subpart F (WAC -190(4))?	✓	

Comments _____

_____

_____

_____

_____

_____

7. IMPORT/EXPORT OF DANGEROUS WASTE (WAC -230).

	Yes	No
A. Does the generator import or export any dangerous waste? (If "No," skip the remainder of the questions in this item.)		✓

B. If the generator exports dangerous waste to other countries, he must comply with 40 CFR Part 262.50. However, Ecology does not yet have authority to implement these standards because they were adopted under the authority of HSWA.

C. If the generator imports waste from foreign countries, does he:

a. Comply with all other requirements for generators (WAC -230(2))? Yes ___ No ___

b. Comply with the Uniform Manifest requirements (including additional WDOE information), except that in place of the generator's name, address, and ID # he enters the name and address of the foreign generator and the importer and the importer's ID #, and in place of the generator's signature on the certification the importer or his agent signs and dates the certification and obtains the transporter's signature (WAC -230(2))? ___ ___

Comments _____

8. TRIPLE RINSING (WAC -230(3), (4) AND -160). Yes No

A. Does the generator triple rinse all containers which are empty and which held EHW in accordance with WAC -160? ✓ ___

B. Does the generator either reuse rinsate from any rinsing operations (including rinsing of tote tanks, truck or railroad tank cars, WAC -230(4)) in a manner consistent with the original product, or else determine if the rinsate is designated as dangerous waste and, if so designated, handle it in accordance with Chapter 173-303 WAC and Chapter 90.48 RCW? ✓ ___

Comments _____

9. NON-PERMITTED SPILLS AND DISCHARGES (WAC -145). Yes No

A. Have there been any nonpermitted spills or discharges on the generator's site which have not been reported to WDOE? ___ ✓

If yes, describe what wastes were spilled and approximately what quantities:

		Yes	No
B.	If the generator has any nonpermitted spill or discharge to ground or to surface or ground waters, does he:		
	a. Notify the appropriate regional office of WDOE (WAC -145(2)(a))?	✓	
	b. Notify all local authorities in accordance with the local emergency plan (if necessary, by checking with the local emergency service coordinator and fire department to determine notification responsibilities under the plan) (WAC -145(2)(a))?	✓	
C.	If the generator has any nonpermitted spill or discharge which results in emissions to the air, does he:		
	a. Notify the local air pollution control authority if the spill or discharge is in western Washington (WAC -145(2)(b))?	✓	
	b. Notify the appropriate regional office of WDOE if the spill or discharge is in eastern Washington (WAC -145(2)(b))?		NA
	c. Notify all local authorities in accordance with the local emergency plan (if necessary, by checking with the local emergency service coordinator and fire department to determine notification responsibilities under the plan) (WAC -145(2)(b))?	✓	
D.	When the generator has any nonpermitted spill or discharge, does he:		
	a. Take appropriate immediate action to protect human health and the environment (WAC -145(3))?	✓	
	b. Whenever required by WDOE:		
	i. Clean up all released wastes or take such other actions as may be required or approved by federal, state, or local officials acting within their responsibilities (WAC -145(3)(a)(i))?	✓	
	ii. Designate and treat, store, or dispose of all soils, waters or other materials contaminated by the spill or discharge (WAC -145(3)(a)(ii))?	✓	

iii. Restore the area impacted by the spill or discharge and replenish resources, if the impacted property is not owned by the generator (WAC -145(3)(a)(iii)?

Yes	No
✓	

Comments _____

10. ANNUAL REPORTS

	Yes	No
A. Does the generator retain copies of Annual Reports for a minimum of three years (WAC -210(2))?	✓	
B. Is the generator generating any wastes which were not reported on his latest Annual Report and which should have been reported?		✓

If "Yes," describe these wastes:

EPA sent 1986 TSD Annual report for [illegible], but checked "no regd wastes" handled and said they wouldn't send any more.

Description/Dangerous Waste #	EHW/DW	Quantity (Month/Batch)

C. Are there any wastes which were reported on his latest Annual Report which the generator is no longer generating? — ✓

If "yes," provide the waste description and Dangerous Waste # as they appeared on the latest Annual Report:

Comments _____

11. ADDITIONAL REPORTS.

		Yes	No
a.	Does the department require the generator to submit any additional reports as provided under WAC -220(3)?	✓	—
	If "Yes," were these reports accurate and submitted in a timely manner? (Specify what additional reports are required and note any deficiencies under Comments, below.)		
b.	If the generator sends labpacks off-site, does he keep an itemized listing of the chemicals, their concentrations and quantities per labpack for purposes of preparing annual reports and in case of emergency during shipment? (WAC -161(6))	—	—

Comments Facility submits NPDES reports (monthly?), quarterly groundwater monitoring reports, and monthly production well reports

12. GENERATOR ACCUMULATION (WAC -200).

This portion of the generator checklist/questionnaire is only applicable to generators who accumulate dangerous waste on-site as allowed for in WAC -200. To determine whether or not this portion is applicable, first complete item A.,

below. If, after completing item A., it is determined that the generator does accumulate dangerous waste on-site, then complete all of the questions under this Section 12. Generator Accumulation. If, after completing item A., it is determined that the generator does not accumulate dangerous wastes, then do not complete the remaining questions under this section 12. Generator Accumulation. (Note: Under certain circumstances, WAC -200(1)(e) allows an accumulating generator who keeps his waste less than ten days to be exempt from all or part of sections WAC -330 through -360. If this is the case for this generator, then complete only item A. and the remaining applicable items of this section 12. Generator Accumulation.)

A. Determining Whether Or Not The Generator's Accumulation Is Subject To WAC -200.	Yes	No
a. If the answers to both of the following questions are "Yes," then do not complete the remaining generator accumulation questions (they will be asked later under Part IV: Facilities). If either or both questions are answered "No," then continue the remaining questions in this item A.		
i. Does the generator operate an on-site dangerous waste management facility?	—	✓
ii. Are all of the generator's dangerous wastes placed in and managed (including stored, treated or disposed) at his on-site facility as soon as they become subject to regulation?	—	✓
b. If the answer to any of the following questions is "Yes," then the generator is subject to the generator accumulation standards of WAC -200, and the remaining items of this section 10. Generator Accumulation must be completed. If the answer to all of the following questions is "No," then the generator is not subject to WAC -200.		
i. Does the generator ever generate more than 2,200 lbs. (1,000 kg) of dangerous waste in a month or batch, or ever accumulate more than 2,200 lbs. (1,000 kg) on-site at any time?	NA	
ii. Does the generator ever generate (per month or per batch) or accumulate on-site at anytime more than 2.2 lbs. (1.0 kg) of EHW discarded chemical products (WAC -081)?	—	—
iii. Does the generator ever hold dangerous wastes on-site for more than ten days after the date the waste quantity first exceeds the applicable quantity exclusion limit?	—	—

iv. Even though the generator removes all wastes in less than ten days, has he been required by WDOE to comply with some or all of WAC -330 through -360? — Yes: — No: NA

Comments _____

B. Ninety-Day* Accumulation Limit. — Yes: — No:

* The time limit is one hundred eighty days for moderate risk wastes held in containers or tanks as allowed by WAC -170(4)(b). One hundred eighty days is also the time limit for persons who generate less than 2200 pounds per month of dangerous waste.

a. Does the generator ship all wastes off-site to, or place them on-site in, a facility permitted (including interim status or permit-by-rule) to manage dangerous wastes within ninety days* or less (WAC -200(1)(a))? — Yes: ✓ — No: —

b. In those cases where wastes were not sent to a facility within ninety days*, did WDOE grant extensions (maximum thirty days) as allowed by WAC -200(1)(a)? — Yes: — No: NA

c. How does the generator determine when the ninety-day* accumulation period begins:

i. When the waste is first generated (WAC -200(2)(a))? — Yes: ✓ — No: —

ii. If he is a small quantity generator, when his aggregated quantity first exceeds the exclusion limit (WAC -200(2)(b))? — Yes: — No: NA

iii. At satellite areas, when each 55 gallon container of dangerous waste or one quart of acutely hazardous waste is full (WAC -200(2)(c))? — Yes: ✓ — No: —

Comments _____

C. Personnel Training (WAC -330).

	Yes	No
a. Does the generator have a written personnel training plan, kept at the generator's site (WAC -330(2))?	✓	
b. Does the personnel training plan include the following documents and records:		
i. For each position related to the handling of dangerous waste on-site, the job title, name of employee filling each job, and the job description, including requisite skills, education, qualifications and duties for each position (WAC -330(2)(a))?	✓	
ii. Written description of type and amount of introductory and continuing training needed for each position (WAC -330(2)(b))?	✓	
iii. Records documenting that employees have received and completed the necessary training (WAC -330(2)(c))?	✓	
c. Are training records retained for at least three years after an employee last worked for the generator, or until the generator closes his site, whichever occurs first (WAC -330(3))? (Note: Records may have been transferred within the company to follow an employee. This is permissible, but some record of the employee's transfer and continued employment should be documented.)	✓	
d. Does the generator provide a training program that teaches personnel to perform their duties in ways that ensures the generator's compliance with WAC 173-303 (WAC -330(1))?	✓	
e. Does the training program involve:		
Classroom instruction?	✓	
On-the-job training?	✓	
f. Is the training program directed by a person knowledgeable in dangerous waste handling practices (WAC -330(1)(a))?	✓	

		Yes	No
g.	Do the generator's employees participate in an annual review of the training provided in the training program (WAC -330(1)(b))?	✓	—
h.	Is the training program successfully completed by each employee within six months of being employed at the generator's site, or of being assigned to a new position, whichever is later (WAC -330(1)(c))?	✓	—
i.	Are new employees supervised until they complete the training program (WAC -330(1)(c))?	✓	—
j.	Does the training program:		
	i. Include training relevant to the positions in which personnel are employed (WAC -330(1)(a))?	✓	—
	ii. Instruct personnel on contingency plan implementation (WAC -330(1))?	✓	—
	iii. Familiarize personnel with emergency equipment and systems, and emergency procedures (WAC -330(1)(d))?	✓	—
k.	Where applicable, does the training program include the following parameters (WAC -330(1)(d))?		
	i. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment.	✓	—
	ii. Key parameters for automatic waste feed cut-off systems.	✓	—
	iii. Communications or alarm systems.	✓	—
	iv. Response to fires or explosions.	✓	—
	v. Response to ground water contamination.	✓	—
	vi. Shutdown of operations.	✓	—

Comments: _____

D. Preparedness and Prevention (WAC -340).

	Yes	No
a. Is each container and tank used for accumulation labeled or marked with the words "Dangerous Waste" or "Hazardous Waste," and with a label or sign which identifies for employees, emergency response personnel and the public the major risk(s) associated with the waste in the container or tank (WAC -200(1)(e))?	✓	—
b. Unless it can be demonstrated that the equipment is not necessary (specify why not in the Comments, below), or the equipment is not required because wastes are held less than ten days (as allowed by WAC -200(1)(e)), are the following equipment present, tested regularly, and kept in good working order:		
i. Internal communications or alarm system capable of providing immediate emergency instructions (WAC -340(1)(a))?		
Present? Hand-held alarm	✓	—
Tested regularly?	✓	—
Good working order?	✓	—
ii. A device capable of summoning police or fire departments or emergency response teams (e.g., telephone, two-way radio) (WAC -340(1)(b))?		
Present?	✓	—
Tested regularly?	✓	—
Good working order?	✓	—
iii. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment (WAC -340(1)(c))?		
Present?	✓	—
Tested regularly?	✓	—
Good working order?	✓	—
iv. Water at adequate volume/pressure to supply hose streams, foam equipment, sprinklers or spray systems (WAC -340(1)(d))?		
Present?	✓	—
Tested regularly?	✓	—
Good working order?	✓	—
c. Whenever dangerous waste is being handled, do all personnel involved have immediate access to an internal alarm or emergency communication system, either directly or through visual or voice contact with another employee (WAC -340(2)(a))?	✓	—

		Yes	No
d.	If there is ever just one employee present on the premises, does he have immediate access to a device (e.g., telephone, two-way radio) capable of summoning external emergency help (WAC -340(2)(b))? always = at least 1 of prof'l present at site	—	—
e.	Is adequate aisle space provided to allow for inspections and unobstructed movement of personnel, fire and spill control equipment and decontamination equipment during an emergency (WAC -340(3))?	✓	—
f.	Do the hazards posed by the wastes handled by the generator require arrangements with local authorities? (If "Yes," complete the remaining questions, g. through k, below. If "No," document under Comments, below, why the hazards are not such as to warrant these arrangements.)	✓	—
g.	Has the generator arranged to familiarize police, fire departments and emergency response teams with: the layout of his site; properties of wastes handled and associated hazards; places where personnel would normally be working; entrances to and roads on the site; and possible evacuation routes (WAC -340(4)(a))?	✓	—
h.	Has the generator arranged to familiarize local hospitals with the properties of dangerous wastes handled and the types of injuries or illnesses which could result from fires, explosions or waste releases (WAC -340(4)(b))?	✓	—
i.	Does the generator have agreements with state emergency response teams, emergency response contractors and equipment suppliers (WAC -340(4)(c))?	—	✓
j.	Where more than one party might respond to an emergency, does the generator have agreements designating primary emergency authority and support services to be provided (WAC -340(4)(d))? internal	—	—
k.	Has the generator documented all instances where state or local authorities have declined to enter into the above arrangements (WAC -340(5))?	—	✓

Comments _____

_____

_____

_____

_____

E. Contingency Plan, Emergency Procedures and Emergencies (WAC -350 and -360)	Yes	No
a. Does the generator have a contingency plan designed to lessen the potential impacts of a fire, explosion or unplanned sudden or nonsudden release of dangerous wastes or dangerous waste constituents to air, soil, surface or ground water (WAC -350(1))?	✓	—
b. Does the generator have a Spill Prevention Control and Countermeasures (SPCC) plan amended to include a contingency plan (WAC -350(2))?	—	✓
c. Are copies of the contingency plan and revisions to it:		
i. Maintained at the generator's site (WAC -350(4)(a))?	✓	—
ii. Submitted to all local police departments, fire departments, and hospitals, and state and local emergency response teams that may provide emergency services (WAC -350(4)(b))?	✓	—
d. Is the contingency plan amended whenever:		
i. Applicable regulations are revised (WAC -350(5)(a))?	✓	—
ii. The plan fails in an emergency (WAC -350(5)(b))?	✓	—
iii. The generator's site changes in a way that increases the potential for fires, explosions, or releases, or that changes the necessary emergency responses (WAC -350(5)(c))?	✓	—
iv. The list of emergency coordinators changes (WAC -350(5)(d))?	✓	—
v. The list of emergency equipment changes (WAC -350(5)(e))?	✓	—
e. Does the contingency plan include:		
i. A description of the actions personnel must take in the event of an emergency circumstance (WAC -350(3)(a))?	✓	—
ii. A description of the arrangements agreed to by local police and fire departments, hospitals, contractors, and state and local response teams to coordinate emergency services (WAC -350(3)(c))?	✓	—

	Yes	No
iii. A current list of emergency coordinators, including names, addresses and twenty-four hour phone numbers (WAC -350(3)(d))?	✓	—
iv. If more than one emergency coordinator is listed, identification of a primary emergency coordinator, with the others listed in the order that they will assume responsibility as alternates (WAC -350(3)(d))?	✓	—
v. A list of all emergency equipment kept on the site, including the location, physical description and brief outline of the capability of each piece of equipment (WAC -350(3)(e))?	✓	—
vi. An evacuation plan (where evacuation could be necessary) for personnel, which describes signals to begin evacuation, evacuation routes, and alternate routes (WAC -350(3)(f))?	✓	—
f. Do the information and elements described in the contingency plan assure that the generator has taken adequate precautions for reacting to emergency circumstances? (If "No," specify what inadequacies exist in the Comments section, below.)	✓	—
g. Is an emergency coordinator on the premises at all times or available on-call at all times (WAC -360(1))?	✓	—
h. Is the emergency coordinator (and his alternates, if any) capable in the following areas (WAC -360(1)):		
i. Familiar with all aspects of the contingency plan?	✓	—
ii. Familiar with all operations and activities on the generator's site?	—	—
iii. Familiar with the location and properties of all wastes handled?	—	—
iv. Familiar with the location of all records kept on-site?	—	—
v. Familiar with the generator's site layout?	—	—
vi. Has the authority to commit the resources needed to carry out the contingency plan?	—	—

		Yes	No
i.	Are the following procedures implemented (or, to be implemented) in the event of an emergency:		
	i. Does the emergency coordinator or his designee (EC/D) immediately activate internal alarms or communication systems to notify all personnel (WAC -360(2)(a)(i)) and notify appropriate state or local agencies with designated response roles if help is needed (WAC -360(2)(a)(ii))?	✓	—
	ii. Does the EC/D immediately identify the character, exact source, amount and areal extent of any released materials (WAC -360(2)(b))?	✓	—
	iii. Concurrently, does the EC/D assess possible hazards to human health and the environment (including direct, indirect, immediate and long-term effects) that may result from the emergency (WAC -360(2)(c))?	✓	—
	iv. If the EC/D determines that the emergency could threaten human health or the environment outside the facility, does he immediately notify and provide an assessment report (which must include the information described under v., below) to:		
	1. The appropriate local authorities if evacuation of local areas may be advisable; and remain available to help appropriate officials decide if local areas should be evacuated (WAC -360(2)(d)(i))?	✓	—
	2. WDOE and either the government official designated as on-the-scene coordinator, or the National Response Center (WAC -360(2)(d)(ii)?	✓	—
	v. Does the assessment report (covered under iv., above) include:		
	1. Name and telephone number of reporter (WAC -360(2)(e)(i))?	✓	—
	2. Name and address of the generator's site (WAC -360(2)(e)(ii))?	✓	—
	3. Time and type of emergency (e.g., fire, release) (WAC -360(2)(e)(iii))?	✓	—
	4. Name and quantity of materials involved (WAC -360(2)(e)(iv))?	✓	—

	Yes	No
5. The extent of injuries, if any (WAC -360(2)(e)(v))?	✓	
6. Possible hazards to human health and the environment off the site (WAC -360(2)(e)(vi))?	✓	
vi. During an emergency, does the EC/D take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other dangerous wastes (e.g., stopping processes or operations, collecting and containing releases, removing or isolating containers, etc.) (WAC -360(2)(f))?	✓	
vii. If operations stop in response to an emergency, does the EC/D monitor for leaks, pressure buildup, gas generation or ruptures wherever appropriate (WAC -360(2)(g))?	✓	
viii. Immediately after an emergency, does the EC/D provide for treating, storing or disposing wastes and materials resulting from the emergency (WAC -360(2)(h))?	✓	
ix. Does the EC/D ensure, in the affected areas on the site, that:		
1. No waste that may be incompatible with the released material is treated, stored or disposed until cleanup procedures are completed (WAC -360(2)(i)(i))?	N/A	
2. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations resume (WAC -360(2)(i)(ii))?	✓	
x. Does the generator notify WDOE, and appropriate local authorities, that his site satisfies the conditions described under ix.1. and 2., above, before operations resume in the affected areas of his site (WAC -360(2)(j))?	✓	
xi. Does the generator note in his operating record the time, date, and details of incidents requiring implementation of the contingency plan (WAC -360(2)(k))?	✓	
xii. Within fifteen days after the emergency, does the generator submit a written report of the incident to WDOE which includes:	✓	

		Yes	No
1.	Name, address, and telephone number of the generator (WAC -360(2)(k)(i)) and of the site (WAC -360(2)(k)(ii))?	✓	
2.	Date, time, and type of emergency (WAC -360(2)(k)(iii))?	✓	
3.	Name and quantity of materials involved (WAC -360(2)(k)(iv))?	✓	
4.	The extent of injuries, if any (WAC -360(2)(k)(v))?	✓	
5.	An assessment of actual or potential hazards to human health or the environment, where this is applicable (WAC -360(2)(k)(vi))?	✓	
6.	Estimated quantity and disposition of recovered material that resulted from the incident (WAC -360(2)(k)(vii))?	✓	

Comments _____

13. METHOD OF ACCUMULATION

		Yes	No
	How does the generator accumulate his dangerous wastes:		
A.	In containers? (Complete Section 14., below.)	✓	
B.	In tanks? (Complete Section 15., below.)		✓

C. in piles (Note: This option is only available for moderate risk wastes)? (Complete Section 16., below.) — N/A

14. ADDITIONAL REQUIREMENTS FOR GENERATORS ACCUMULATING WASTES IN CONTAINERS.

	Yes	No
A. Are all containers in good condition, and are dangerous wastes transferred to good containers or otherwise managed if the original container leaks (WAC -630(2))?	✓	
B. Are all containers marked with the date accumulation began (WAC -200(1)(c))?	✓	
C. Are all containers made of or lined with materials that will not react or are otherwise compatible with the wastes being accumulated (WAC -630(4))? (If necessary, request and obtain documentation to demonstrate waste/container compatibility.)	✓	
D. Are all containers used for accumulating dangerous wastes:		
a. Always closed except when wastes are added or removed (WAC -630(5)(a))?	✓	
b. Not opened, handled, or stored (e.g., left in areas of heavy traffic where collisions could occur, or personnel or the public could intentionally or accidentally damage the containers) in ways that would rupture the containers or cause them to leak (WAC -630(5)(b))?	✓	
c. Stored in a manner which allows the generator to inspect each container for leaks, ruptures or deterioration?	✓	
E. Does the generator inspect at least weekly the areas where containers are used to accumulate wastes, looking for leaking containers and for deterioration from corrosion and other factors (WAC -630(6))?	✓	
F. Does the generator keep records of weekly inspections of his container storage area which describe (WAC -630(6)):		
a. The dates of inspection and name(s) of inspector(s)?	✓	
b. Observations of any leaks or container deterioration detected?	✓	
c. Measures taken to correct leaks or deteriorated containers (if any)?	✓	

G. Are containers used for accumulating ignitable or reactive dangerous waste? — ✓

If "Yes":

a. Are containers holding reactive wastes (if any) capable of detonation or explosion, or that are forbidden explosives or Class A or B explosives (49 CFR 173.51, 53 or 88) stored equivalent to UFC's "American Table of Distances for Storage of Explosives," Table 77-201 (WAC -630(8)(a))? — —

b. Are all other ignitable or reactive waste container storage designed, operated and maintained equivalent to the Uniform Fire Code, state or local fire codes, or NFPA Pamphlet #30, "Flammable and Combustible Liquids Code" (WAC -630(8)(b))? — —

c. Are those areas where ignitable or reactive wastes are accumulated inspected at least yearly by a professional person familiar with the Uniform Fire Code, or by a federal, state, or local fire marshal (WAC -630(8)(b), -395(1)(d))? — —

d. Does the generator keep records of these fire inspections which describe:

i. The dates of inspection and name(s) of inspector(s)? — —

ii. Observations of any unsafe or improper ignitable or reactive waste handling? — —

iii. Measures taken to correct any unsafe or improper ignitable or reactive waste handling? — —

H. Are incompatible wastes or incompatible wastes and materials accumulated or held on-site (e.g., corrosives with ignitables, chlorinateds with ignitables)? — ✓

If "Yes":

a. Describe which wastes or wastes and materials are incompatible:

_____

_____

_____

_____

_____

		Yes	No
b.	Does the generator assure that dangerous wastes are not put in containers which previously held incompatible wastes or materials unless the container has been washed (WAC -630(9)(b))?	✓	
c.	Are containers holding waste that is incompatible with wastes or materials stored nearby separated or protected from such wastes or materials by a dike, berm, wall or other device, and are containment systems (if any) for incompatible wastes separate (WAC -630(9)(c))?		
d.	Are incompatible wastes, or incompatible wastes and materials put in the same container?		
	Describe which incompatible wastes or wastes and materials are involved:		
	_____		
	_____		
	_____		
	_____		
	_____		
e.	If incompatible wastes or wastes and materials are mixed or commingled, are these activities conducted so as <u>not</u> to (WAC -630(9)(a)):		
	i. Generate extreme heat, pressure, fire, explosion or violent reaction (WAC -395(1)(b)(i))?		
	ii. Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment (WAC -395(1)(b)(ii))?		
	iii. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions (WAC -395(1)(b)(iii))?		
	iv. Damage the structural integrity of the facility or containers (WAC -395(1)(b)(iv))?		
	v. Otherwise threaten human health or the environment (WAC -395(1)(b)(v))?		

Note: If the generator is treating wastes as they are placed in his containers (other than simple mixing with an absorbent), he may be operating a dangerous waste treatment facility.

I. SECONDARY CONTAINMENT (WAC -200(7))	Yes	No
For new container accumulation areas constructed after September 30, 1986 or for persons who have been required to do so by WDOE on a case-by-case basis, have the following containment standards been met?	Is < 1986	
i. Is the containment system capable of collecting and holding spills and leaks? (WAC -630(7)(a))	✓	
ii. If the storage area is uncovered, is the containment system capable of holding the additional volume that would result from the precipitation of a maximum 25 year storm of 24 hours duration? (WAC -630(7)(a))	N/A	
iii. Does the containment system have an underlying base which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills and accumulated rainfall until the collected material is detected and removed? (WAC -630(7)(a))	✓	
iv. Is the base sloped or the containment system otherwise designed and operated to drain and remove liquids from leaks, spills, or precipitation, unless the containers are elevated or otherwise protected from contact with accumulated liquids? (WAC -630(7)(a)(i))	✓	
v. Is the system designed for positive drainage control (such as a locked drainage valve) to prevent release of contaminated liquids and so that contaminated precipitation can be drained promptly for convenience of operation? (WAC -630(7)(a)(ii))	NA	
vi. Is spilled or leaked waste and accumulated precipitation removed in as timely a manner as necessary to prevent overflow? (WAC -630(7)(a)(ii))	✓	
vii. Does the containment system have sufficient capacity to contain 10 percent of the volume of all containers or the volume of the largest container (holding free liquids or dioxin wastes), whichever is greater? (WAC -630(7)(a)(iii))		✓
viii. Is the run-on into the containment system prevented? (WAC -630(7)(b))	✓	
If no, has WDOE waived this requirement? (WAC -630(7)(b))		
ix. Are EHW in containers protected from the elements by means of a building or other protective covering that otherwise allows adequate inspection? (WAC -630(7)(d))	NA	

x. For storage areas that store containers holding only wastes that do not contain free liquids, do not exhibit either the characteristic of ignitability or reactivity, and are not listed as F020, F021, F022, F023, F026 or F027, instead of the containment requirements described above, only the following two requirements need apply (WAC -630(7)(c)):

Yes No

- o Is the storage area sloped or otherwise designed and operated to drain and remove liquids resulting from precipitation; or — NA
- o Are the containers elevated or otherwise protected from contact with accumulated liquids? — NA

Comments _____

15. ADDITIONAL REQUIREMENTS FOR GENERATORS ACCUMULATING WASTES IN TANKS.

Yes No

A. Does the generator maintain a system of records which assure that no wastes held in his tanks are being accumulated for more than ninety days (one hundred eighty days for moderate risk wastes or generators of less than 2200 pounds per month of dangerous wastes)? — —

B. Are wastes or other materials which are incompatible with the material of construction of the tanks ever placed in the tanks? — —

If "Yes," is the tank protected from corrosion, erosion or abrasion through use of:

a. An inner liner, free of leaks, cracks, holes or other deterioration, which is compatible with the waste or materials (WAC -640(3)(a)(i)? — —

b. Alternative protection (e.g., cathodic protection, corrosion inhibitors) (WAC -640(3)(a)(ii))? ___ ___

C. Does the generator use appropriate measures to prevent overfilling and overtopping, including: Yes No

a. Controls to prevent overfilling (e.g., waste feed cut-off systems, by-pass to a standby tank) (WAC -640(3)(b)(i))? ___ ___

b. For uncovered tanks, maintenance of at least two feet of freeboard (WAC -200 (1)(b), -640(3)(b)(ii))? ___ ___

D. Does the generator inspect at least <u>once each operating day</u>:

a. Overfilling control equipment to ensure it is in good working order (WAC -640(4)(a)(i))? ___ ___

b. Data gathered from monitoring equipment where present, to ensure each tank is operated according to its design (WAC -640(4)(a)(ii))? ___ ___

c. For uncovered tanks, the level of waste in each tank to ensure the freeboard is at least two feet (WAC -640(4)(a)(iii))? ___ ___

E. Does the generator inspect at least <u>weekly</u>:

a. The construction materials of the above ground portions of each tank to detect corrosion, erosion or leaking of the tank, fixtures and seams (WAC -640(4)(a)(iv))? ___ ___

b. The area immediately surrounding each tank to detect obvious signs of leakage (e.g., wet spots, dead vegetation) WAC -640(4)(a)(v))? ___ ___

F. Does the generator have a written schedule for inspecting his tanks which includes records describing (WAC -640(4)(b)):

a. The dates of inspections and name(s) of inspector(s)? ___ ___

b. Observations of any conditions which could cause the tank to leak or fail as specified in the written schedule? ___ ___

c. Measures taken to correct or prevent any hazardous conditions identified during the inspection? ___ ___

G. Does the generator have records describing dates that spills or leaks (if any) from his tanks occurred and measures taken to clean up and decontaminate the spills or leaks (WAC -640(4)(c))? (Note: The measures to be

taken to respond to spills or leaks should be described in his contingency plan.) — —

H. Does the generator have records showing that at least once each operating day he: Yes No

a. Gathered data from monitoring equipment to ensure the tank was operated according to its design (WAC -640(4)(a)(ii))? — —

b. Checked the level of waste in uncovered tanks (if any) to ensure that a minimum freeboard of two feet was maintained (WAC -640(4)(a)(iii), -200(1)(b))? — —

I. Have any tanks been closed and removed from dangerous waste service since the last inspection? — —

If "Yes":

a. Have all dangerous wastes and residues been removed from the tanks, discharge control equipment, containment systems and bases (where present) and discharge confinement structures (WAC -640(5))? — —

b. Have all tanks, bases, liners and soils containing or contaminated with dangerous wastes or residues been removed or decontaminated (WAC -640(5))? — —

J. Are ignitable or reactive wastes placed in tanks? — —

If "Yes":

a. Is the tank only used for emergencies (WAC -640(6)(a)(iii))? — —

b. Is the waste stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react (WAC -640(6)(a)(ii))? — —

c. Is the waste treated, rendered or mixed before or immediately after placement in the tank so that (WAC -640(6)(a)(i)):

i. The resulting mixture in the tank is no longer ignitable or reactive under WAC -090? — —

ii. And, the mixing or commingling of the waste does not: generate extreme heat, pressure, fire, explosion or violent reaction; produce uncontrolled toxic mists, fumes, dusts or gases that threaten human health or the environment; produce uncontrolled flammable fumes or gases that pose a risk of fire or

explosion; damage the structural integrity of the tank or equipment; otherwise threaten human health or the environment (WAC -395(1)(b))? ___ ___

Note: If the generator is treating wastes as they are placed in his tanks, he may be operating a dangerous waste treatment facility.

d. Are the tanks located in a manner equivalent to the NFPA's buffer zone requirements for tanks (Tables 2-1 through 2-6 of the NFPA-30 "Flammable and Combustible Liquids Code - 1981"), or as required by state and local fire codes if these are more stringent (WAC -640(6)(b))? ___ ___

e. At least yearly, is the tank storage area inspected by a professional person knowledgeable in the Uniform Fire Code, or by a local, state or federal fire marshal (WAC -640(6)(b), - 395(1)(d))? ___ ___

f. Does the generator keep records of this annual inspection describing:

i. The dates of inspection and name(s) of inspector(s)? ___ ___

ii. Observations of any unsafe or improper ignitable or reactive waste handling? ___ ___

iii. Measures taken to correct any unsafe or improper ignitable or reactive waste handling? ___ ___

E. Are incompatible wastes or incompatible wastes and materials placed in the same tank? ___ ___

If "Yes":

a. Describe which wastes or wastes and materials are incompatible:

_____

_____

_____

_____

_____

b. If incompatible wastes or wastes and materials are placed in the same tank, or if dangerous waste is placed in an unwashed tank which previously held

incompatible waste or materials, are these activities conducted so as not to (WAC -640(7)):

i. Generate extreme heat, pressure, fire, explosion or violent reaction (WAC -395(1)(b)(i))? — —

ii. Produce uncontrolled toxic mists, fumes, dusts or gases that threaten human health or the environment (WAC -395(1)(b)(ii))? — —

iii. Produce uncontrolled flammable fumes or gases that pose a risk of fire or explosion (WAC -395(1)(b)(iii)? — —

iv. Damage the structural integrity of the tank or equipment (WAC -395(1)(b)(iv))? — —

v. Otherwise threaten human health or the environment (WAC -395(1)(b)(v))? — —

Note: If the generator is treating incompatible wastes as they are placed in his tanks, he may be operating a dangerous waste treatment facility.

Comments _____

16. ADDITIONAL REQUIREMENTS FOR GENERATORS ACCUMULATING WASTES IN PILES. Yes No

Note: This section is applicable to only those moderate risk wastes a generator may be accumulating.

A. Does the generator keep records of any leaks of liquids into the leak detection system that have occurred, describing (WAC -660(3)(b)):

a. Dates and times leaks were detected? ___ ___

b. Measures taken to remove accumulated liquids and stop leakage that is occurring? ___ ___

c. Certification by a qualified engineer that the leak has been stopped? ___ ___

B. Does the generator keep records of any notifications sent to WDOE that there have been leaks into the leak detection system (if any?) ___ ___

C. [Remainder to be added at a later date.]